

Slum Housing and the City of Los Angeles:
An Analysis of the Intersection of Human Rights and Enforcement Policies

Maddisen Domingo

April 17, 2012
Senior Comprehensive Project
Urban & Environmental Policy Department

Executive Summary

Slum Housing and the City of Los Angeles: An Analysis of the Intersection of Human Rights and Enforcement Policies closely examines city slum housing enforcement policies from the point of view of tenant organizers and tenant advocates and seeks to answer how the City of Los Angeles can strengthen its housing code enforcement policies in order to best protect the health and human rights of tenants. The point of view of tenant organizers and advocates is emphasized as it is often overlooked and ignored in policy creation and these individuals have an intimate relationship with the system as well as personal connections with the tenants who live in these conditions. Their unique insights, focusing both on the personal and the system, make their voice extremely valuable in analyzing Los Angeles slum housing enforcement policies. This report uses the city of Los Angeles as a case study for how a human rights framework can be applied to address city policies and programs regarding slum housing problems in order to provide recommendations for policy and program reforms that move towards securing the rights of all tenants to safe and healthy housing while addressing the underlying causes of slum housing. Through secondary sources combined with primary research in the form of interviews with individuals from various non-profits and community based organizations focusing on Los Angeles slum housing issues, this report compiles key findings regarding Los Angeles policies and where they succeed and fail to fully protect the health and human rights of Los Angeles tenants.

This report first lays out housing as a human right using international and Los Angeles documents to establish an argument for fighting slum housing. It then lays out academic research connecting substandard conditions with tenant health and unpacks the

methodological limitations of research on the effects of housing conditions on individuals. By providing an overview of health effects caused by housing conditions ranging from inadequate plumbing, unsafe heating, electrical or heating issues, structural damage, and the presence of disease ridden pests and vermin it becomes apparent that by not addressing slum housing, the individual human rights of these low-income tenants are violated.

Historical examples of federal slum housing policies are used to establish examples of policies that did not incorporate a human rights framework and focused primarily on slum clearance rather than protecting and supporting tenants of these buildings. Keeping in mind the failure of these policies contextualizes the contemporary Los Angeles case study within a broader historical framework.

The case study breaks down the history of affordable housing in Los Angeles as well as influential state laws that directly effected and encouraged the proliferation of slum housing in the city of Los Angeles. An extensive part of the case study describes the role that Los Angeles's Rent Stabilization Ordinance, Systematic Code Enforcement Program, and Rent Escrow Account Program play in regards to combating slum housing.

The findings within this report are broken up into two different categories. The first includes specific analysis of where and why city policies and programs fail to fully protect tenants. This section breaks down interagency bureaucracy (issues of jurisdiction, lack of communication and collaboration, as well as jurisdictional overlaps or gaps), the result of non-holistic and non-standardized inspector trainings, specific inspection protocols, an analysis of enforcement mechanisms and their weaknesses, and funding issues in programs and agencies focused on slum housing. The second half of the

findings focus on broader issues related to slum housing such as the lack of affordable housing and how it relates to the production of slum housing conditions, the role of public and elected officials in slum housing issues, the role of non-profits and community-based organizations in combating slum housing, as well an overview of the foreclosure crisis and how it affects the slum housing.

In response to these findings, recommendations for the city of Los Angeles are presented to best ensure the rights of low-income marginalized tenants are met. The primary recommendation for addressing slum housing requires an ideological shift within agencies to recognize safe housing as a human right and therefore prioritize the health and rights of tenants above bureaucracy or a landlord's protection of private property. This ideological shift will translate into several substantial key recommendations. These recommendations as follows are expanded upon in the Recommendations and Conclusion section:

- The institution of an aggressive and systematic approach to hold landlords accountable as service providers
- Cutting back the bureaucracy between city, county, and state agencies through simplifying jurisdiction and creating an interagency taskforce or forum
- Creating inspector training that emphasizes the connection between housing conditions and health implications as well as general tenant issues and the Rent Stabilization Ordinance
- Instituting inspections that are more accessible to non-English speaking tenants
- Seeking out strategies to increase funding for slum housing enforcement programs
- Increasing landlord outreach to prevent slum housing conditions and quicken remediation efforts
- Strategies to address the underlying causes of slum housing conditions such as the lack of affordable housing and the lack of public awareness

TABLE OF CONTENTS

INTRODUCTION	5
METHODS	10
BACKGROUND	12
WHY HOUSING MATTERS: HUMAN RIGHTS	12
SLUM HOUSING HISTORY	14
HOUSING AND HEALTH	20
LOS ANGELES HOUSING STATISTICS	29
LOS ANGELES POLICY: A CASE STUDY	31
REAP, SCEP, AND SLUM HOUSING: A CLOSER EXAMINATION	42
RECOMMENDATIONS AND CONCLUSION	73
BIBLIOGRAPHY	87

APPENDICES

APPENDIX A: LIST OF INTERVIEWEES AND THEIR AFFILIATIONS
APPENDIX B: LOS ANGELES HOUSING DEPARTMENT'S NOTICE AND ORDER TO COMPLY - SAMPLE
APPENDIX C: LOS ANGELES DEPARTMENT OF HEALTH'S HOUSING OFFICIAL INSPECTION REPORT – SAMPLE

Introduction

Home is, supposedly, where the heart is, but for many, the home is not a safe place. In response to egregious slum conditions Congress declared through the American Housing Act of 1949, “a decent home in a suitable living environment for every American family” a necessity, but 60 years later this goal is far from realized.

Throughout the United States people live in what can be called slum housing conditions.¹

My first experience with slum housing occurred in the fall of 2010 while interning at the Coalition for Economic Survival, a prominent tenants’ rights organization in Los Angeles. While interning I witnessed, for the first time in my life, these poor conditions. I spoke to tenants living in conditions that I did not think possible in the United States. As I witnessed the effects that leaky pipes, cracks in walls, peeling paint, lack of proper heating or water, and infestations of rats, mice, cockroaches, and even bedbugs had on tenants, I realized that these conditions have deeply painful physical and psychological effects on residents. The problem was not happenstance, rather I noticed that it was systemic as it dripped of racism and classism. There was no other explanation for why the individuals I worked with were most often low-income, recent immigrants, and/or people of color. After the conclusion of my internship, I did not soon forget the power dynamic I witnessed among tenants, attempting to secure decent housing, and landlords, who reneged on their responsibilities and did not provide safe housing, or the role the city

¹ I use the term “slum housing” to encompass all housing conditions that can be considered inadequate and unsafe. I define inadequate and unsafe conditions as those that endanger a tenants’ health and is not up to code. The term “slum housing” is not an official term and cannot be found in any California State code or Los Angeles Municipal code regulations. This layman terminology is used most often by the non-profit sector to describe unsafe housing conditions. Housing conditions are referred to as substandard, uninhabitable, or untenable under local, state, and federal regulations. The term “slum housing” is used interchangeably with these other terms throughout this report.

played mediating between these parties. As I saw these slum housing conditions endanger and encroach upon the right of these tenants for safe and healthy homes, I realized that a closer analysis of the issue was needed to explain what I had witnessed.

Slum housing conditions, as with any other ill in our society, do not manifest on their own – they have root causes and it logically follows that they must have solutions. Effectively addressing slum housing requires a critical analysis of all aspects of current policies and programs - ranging from an investigation of program shortcomings, a discussion of whos rights are prioritized, to a closer look at the development of these policies over time. Most importantly the perspective of tenants organizers and advocates, those committed fully to improving tenant conditions and housing, must be heard as their insights are often overlooked. An analysis of these policies must focus specifically on how these policies understand the relationship housing conditions have with health effects. A human rights perspective, one that sees each person as justifiably entitled to particular rights, reveals the importance and need for expediently addressing the current slum housing environment.

Slum housing, as it exists today, must be understood within the context of the economic crisis. In 2008 the United States experienced a recession that dramatically changed the American economy and the American perception of financial security. In the two years following the recession, upwards of 3.5 million homes were foreclosed on.² When discussing the effects of the recession on housing, most focus is placed on the foreclosure crisis. Due to the historical significance of this event, the foreclosure crisis remains a national public issue that outshines quality of housing and the new emerging

² Joint Center for Housing Studies. 2011. (22) *The State of the Nation's Housing*. Harvard University.

issue of banks becoming landlords. This focus has hindered a large-scale initiative to address the issue of slum housing as it overlooks other negative consequences caused by the foreclosure crisis.

The city of Los Angeles did not remain an outlier in relation to this economic crisis. Each year the United States Department of Housing and Urban Development (HUD), releases data stipulating Fair Market Rents³ (FMR) within counties. In 2012, several years after the beginning of the recession, the Los Angeles Metropolitan County was one of the more unaffordable areas in the country. The FMR for a one-bedroom apartment was \$1,159.⁴ The most recent 2003 American Housing Survey for the Los Angeles-Long Beach Metropolitan also found 379,200 units or 23% of all rental units, were occupied by tenants below the poverty level.⁵ With such a high rate of poverty, a unit renting at \$1,159/month is unattainable for so many. This is especially the case for people of color who on the whole are disproportionately low-income. In Los Angeles African American and Latino renters, as of 2010, have poverty rates of 28.3% and 27.8%, whereas only 11.6% of whites within Los Angeles city find themselves below the poverty rate.⁶ This data displays the disproportionate ways in which poverty, and subsequently, slum housing affect who is able to afford rental units at, or above, Fair Market Rents.

According to the Los Angeles Affordable Housing Program, the only individuals able to afford a studio at FMR are those of moderate income. Those of low income, very

³ The definition of a Fair Market Rent, or FMR, is the rental price for a unit if the unit was rented at the current market value.

⁴ U.S. Department of Housing and Urban Development. HUDUSER Dataset. (2012). FY2012 Fair Market Rent Documentation System: The Final FY2012 Los Angeles County FMRs for All Bedroom Sizes, http://www.huduser.org/portal/datasets/fmr/fmrs/FY2012_code/2012summary.odn

⁵ U.S. Department of Housing and Urban Development and U.S. Census Bureau. (2003). American Housing Survey for the Los Angeles-Long Beach Metropolitan Area

⁶ U.S. Census Bureau, American FactFinder, American Community Survey 2010, S1701, 1-year estimates

low income, and the extremely low-income category would be unable to rent said studio without being rent burdened.⁷ Officially, an individual is rent-burdened when they pay more than 30% of their income on housing. Securing affordable housing is economically unfeasible for Los Angeles residents earning at or below the Area Median Income (AMI) in Los Angeles is \$64,800.⁸ With few affordable options, families throughout the city settle for overcrowded, substandard, and rent-burdened living conditions. With a lack of affordable options, renters are put in the predicament where they must choose whether to overpay or settle for substandard conditions such as slum housing. In this situation landlords continuously profit by reducing maintenance costs and increasing profits all the while knowing that tenants will settle for such conditions due to a lack of better options.

In the city of Los Angeles, this situation collides with one of the most innovative slum housing enforcement policies in the nation. Although the city of Los Angeles has paved the way in visionary programs to fight slum housing and has taken a proactive approach, these slum housing enforcement policies have yet to solve the issue. But even this innovation, has not ended the slum housing problems.

This report will provide the perspectives of community-based tenants rights organizations and tenant advocates to analyze the effectiveness of Los Angeles city initiatives regarding slum housing conditions in order to establish policy recommendations that work towards improving housing conditions for all and take into account the knowledge of those who are determined to create a just housing environment.

⁷ The low income, very low income, and extremely low income categories are defined by HUD as follows: Lower Income (80% of AMI), Very Low Income (50% of AMI), and Extremely Low Income (30% of AMI)

⁸ U.S. Department of Housing and Urban Development. HUDUSER Dataset. (2012). FY2012 Income Limits Documentation System: FYI 2012 Income Limits Summary FMRs, <http://www.huduser.org/portal/datasets/il/il2012/2012summary.odn>

Through a closer examination of the current state of housing in our city, we can see the necessity of addressing this problem with expediency.

Methods

The majority of this research was done through key informant interviews with the goal of answering the question “According to tenant organizers and advocates, how can the City of Los Angeles strengthen its housing code enforcement policies in order to best protect the health and human rights of tenants in Los Angeles?” I conducted interviews with individuals involved in slum housing issues throughout the city of Los Angeles. I spent January through April 2012 as a research intern at Strategic Actions for Just Economy and interviewees were identified with the help of the staff at SAJE. Interviewees were from diverse backgrounds in the housing world and ranged from tenant organizers, directors of policy in non-profits, executive directors, and directors of environmental health. A complete list of those interviewed and their related organizations can be found in Appendix A. These interviews generally lasted anywhere from an hour to two hours and were conducted in person or by phone. Interviews were not recorded, but in depth notes were taken. In addition to interviews, I analyzed city codes and regulations as well as housing inspection forms, and read articles, reports, and books to supplement my report. Online research was primarily used to gather background data and to access Los Angeles city program information – including enforcement policy structure, audits, and regulations. Occidental College library catalog and journal research was used in order to identify books and articles to explore the connections between housing conditions and health as well as the historical usage of slum clearance policies.

Interview subjects were identified and contacted via the email and asked through email if they’d participate in research conducted outside of their workplace either by phone or in person. Interviews were conducted between February and April of 2012. The

interviews were semi-structured and interview questions varied between subjects dependant on their area of expertise, though all questions were open-ended. Questions were focused to gain understanding and knowledge regarding the effectiveness of Los Angeles slum housing enforcement policies, the barriers that exist to protect the health of tenants, and the expert opinions of these individuals.

Why Housing Matters: Human Rights

Personal freedom is exalted in the United States. Unfortunately, in the context of rental units, an emphasis on these personal freedoms often oppose safe housing conditions as it becomes a battle between private property and personal health. In Los Angeles, this occurs when a landlord's rights are put above a tenant's personal rights through codified regulations and practices. In a country focused on individual freedoms, time and time again the rights of a landlord to due process or private property hinders tenants safety. This power dynamic has served to reinforce a system already slanted against low-income communities, communities of color, and recent immigrants. As a result of this structural system that protects the rights of landlords over the rights of tenants egregious human rights violations occur time and time again.

The connection between health, housing, and human rights, has not escaped the international community. The United Nations Declaration of Human Rights (UDHR) ensures rights for all individuals regardless of social identities. Article 25 of the UDHR states, "Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care."⁹ By connecting housing to human rights, the issue of slum housing gains great weight. Within Los Angeles, the UDHR has been used to argue policy and program changes, in hopes of creating a just system grounded in protected human rights.¹⁰

The list of organizations involved in housing issues (ranging from affordability to slum housing and beyond) is never ending in Los Angeles. Although not every

⁹ The United Nations. (Article 25) The Universal Declaration of Human Rights. <http://www.un.org/en/documents/udhr/>.

¹⁰ Lowe, Albert, Gilda Haas, and eds. 2007. *Shame of the City: Slum Housing and the Critical Threat to the Health of L.A. Children and Families*. Los Angeles: Strategic Actions for a Just Economy, April.

organization will explicitly use “human rights” in campaigns for equity, this does not mean that ensuring the human rights for all is not their ultimate goal. This list of organizations and non-profits includes, but is not limited to; ACCE, Coalition for Economic Survival, East Los Angeles Community Corp, Esperanza Community Housing Corp., Figueroa Corridor Land Trust, Inner City Law Center, Inquilinos Unidos, L.A. Coalition to End Hunger & Homelessness, L.A. Voice, Los Angeles Community Action Network (LACAN), Neighborhood Legal Services, St. John’s Well Child and Family Center, Strategic Actions for a Just Economy (SAJE), and Union de Vecinos. These entities range from legal clinics, health clinics, and community-based organizations to being single-issue based or having a broader focus with occasional work regarding housing issues. Their endless fight to protect the rights of Los Angeles’ tenants helps make Los Angeles one of the most progressive cities in the United States.

Many of above, have adopted this international human rights framework to analyze slum housing conditions in Los Angeles and contextualize the current state of affairs within this established and legitimized framework. Unfortunately, applying this focus, in and of itself, has failed to fix rental housing conditions throughout the city.

In response to the failure of this international document’s ability to adequately secure fair housing, South Los Angeles rebelled and took action to ensure the rights to safe housing for all residents. In 2009, a coalition of community organizations and non-profits from throughout South Los Angeles, many of the above mentioned included, created the South Los Angeles Declaration of Health and Human Rights in order to create a declaration of human rights document specific to Los Angeles. Reclaiming the

international framework, to a specific location, places human rights violations within a Los Angeles context.

In regards to housing, the declaration calls for “healthy, safe, and secure housing regardless of race, gender, class, immigration status, sexual orientation, religion, family structure or other chosen household configuration”¹¹. As of now, the city has failed to secure this right as a disproportionate level of slum housing is found in low-income, immigrant, and communities of color. The declaration also calls for “environmentally healthy conditions within and outside the home to promote the flourishing culture, mental and physical health and fitness, and economic prosperity.”¹² This right is far from achieved and reports produced by SAJE and other non-profits substantiate this claim. Finally the report calls for “housing that meets the needs of the people...at every level of affordability, affordability levels that are preserved, and housing stock well maintained for the health and well-being of residents.”¹³ In a city where the FMR makes even the most quaint rental unit unaffordable, the city has not taken adequate action to ensure affordability, which has, as a byproduct, created the conditions necessary for the proliferation of slum housing. By emphasizing human rights, it becomes impossible to ignore slum housing as an issue that needs immediate response and improvements.

Slum Housing History

Before looking at the current policy surrounding slum housing conditions it is necessary to discuss the history of slum housing in the United States. Historical policies

¹¹ South Los Angeles Declaration of Health and Human Rights. 2009.

<http://www.southlahealthandhumanrights.org/declaration.html>

¹² Ibid.

¹³ Ibid.

regarding slum housing focused on the clearing of slums, rather than remediation and improvement of conditions so as to provide safe, adequate, and affordable housing. These policies often took little interest in how they might violate the rights of the tenants they were seeking to help. The lack of protection of the rights of those living within slum conditions becomes apparent as one investigates these historical policies.

The reality of slum conditions within the United States has time and time again been hidden from the general public. The release of Jacob Riis' *How the Other Half Lives* prompted one of the first moments in which slum conditions were brought to the attention of the general public. In 1890, this photojournalist used flash photography, then a brand new technology, to illuminate the story of the conditions under which the poorest families in New York were living. He photographed the tenements and exposed to the middle and upper classes a life that had remained hidden for so long. During this time, it was commonly believed that the condition of being in poverty was byproduct of the aspects inherent within the poor themselves.¹⁴ ¹⁵ The work of Riis helped battle this belief and shifted the conversation to one where tenants were discussed as victims of circumstance. By displaying the extent of poverty and these truly unsafe conditions Riis helped elevate the visibility of housing inequity in New York. Although this report and others produced by Riis helped shock the general public and increase the understanding of slum housing, it was not enough to end slum housing.

¹⁴ Morris, James. 2008. "Poverty of the Imagination: A Review of 'The Other Half: The Life of Jacob Riis and the World of Immigrant America' by Tom Buk-Sweinty; Annette Buk-Sweinty." *The Wilson Quarterly* 32 (4): 96-97.

¹⁵ Fraser, Steve. In the Last Gilded Age, People Stood Up to Greed -- Why Aren't We? | Economy | AlterNet. <http://www.alternet.org/economy/83668/?page=1>.

In 1949, sixty years after Riis published *How the Other Half Lives*, the United States passed the Housing Act of 1949 in attempts to end these unsafe and deleterious housing conditions. The Housing Act of 1949, along with many of its predecessors, launched policies and programs focused on slum clearance and urban renewal in order to remedy these unhealthy and unsafe conditions. These policies rested on the platform that these programs would benefit both those living in these dangerous units as well as the city at large. Slum clearance programs in this incarnation lasted up until the 1960's and were loosely based on the premise that the “blight” of slums was a contagious quality and demolition of these structures was the best choice to prevent this affliction from spreading.¹⁶ In order to protect the city, clearance programs were seen as necessary actions to be taken.

Studies of these urban renewal programs point out that although these programs may have, in fact, improved cities as a whole when measuring median incomes, property values, the growth of housing stock, and employment and poverty rates, their deemed success rarely took into account the effects that these programs had on the tenants who lived within these blighted properties and in fact often turned the intended beneficiaries of these programs into the victims.^{17 18} In reference to the success of these programs, one such scholar said that although these programs had produced a mechanism for clearing slums, they had not adequately “produced an instrument that assures the replacement of

¹⁶ Collins, William J, and Katharine Shester. 2010. (3) *The Economic Effects of Slum Clearance and Urban Renewal in the United States*. Working Paper. Department of Economics, Vanderbilt University, October. <http://econpapers.repec.org/paper/vanwpaper/1013.htm>.

¹⁷ Ibid.

¹⁸ Grigsby, William G. 1964. “Housing and Slum Clearance: Elusive Goals.” *Annals of the American Academy of Political and Social Science* 352 (March 1): 107-118.

these structures with decent living accommodations.”¹⁹ By not including such measures, these programs failed to secure these tenants rights to fair and affordable housing and left tenants to secure housing on their own.

Although urban renewal programs have formally ended, they have been reincarnated in contemporary forms. For one, the federal HOPE VI program epitomizes a recent initiative to address slum housing conditions on the national scale that is reminiscent of earlier slum clearance programs. In response to the rampant dangerous conditions reported in Public Housing, the National Commission on Severely Distressed Public Housing came together to provide recommendations to improve the slum conditions in federally subsidized Public Housing complexes. In reaction, Congress launched the Housing Opportunities for People Everywhere (HOPE VI) program in 1993. With the goals of improving the safety standards of public housing and promoting mixed-income living, HOPE VI tore down and rebuilt hundreds of thousands of Public Housing units. Between 1993 and 2007, HOPE VI was responsible for the demolition and/or rehabilitation of 156,000 units.²⁰ These were replaced by an estimated 111,000 units, all of which conformed to stricter safety and health standards.²¹ Although these units improved living conditions, they were ineffective at protecting and supporting tenants overall as they were 45,000 units short of replacing the affordable housing stock numbers that existed prior to the institution of HOPE VI.²² Without these 45,000 units being reconstructed, thousands of families were left to find new housing.

¹⁹ Ibid. 111

²⁰ Schwartz, Alex F. 2010. *Housing Policy in the United States, Second Edition*. 2nd ed. T & F Books US, February 8.

²¹ Ibid.

²² Ibid.

Following through on theories that mixed-income housing can increase upward mobility, HOPE VI replaced Public Housing for low-income residents with mixed-income complexes. Instead of the traditional minimalist units found in Public Housing, these remediated complexes included units with nicer amenities to attract families who were not traditionally eligible for Public Housing.²³ Although well-intentioned, these remediated complexes failed to improve the quality of life for the lowest income individuals. Under this program only 5% of original residents moved back into their units post-renovation. The other 95% of the original tenants ended up displaced with relocation upon them.²⁴

Whereas traditional urban renewal programs had few mechanisms in place to deal with displacement, HOPE IV was directly tied to the federal rental voucher program Section 8. Section 8 vouchers are still in use today and function to subsidize rental units for families or individuals who cannot afford safe and healthy housing at the fair market rents. Those who qualify for Section 8 can use their voucher to subsidize rent for a private market rental unit when that unit meets the standards set by the program. These standards set forth by the Section 8 program, include being within a maximum allowable rent, the meeting of physical standards for the unit, and a willing landlord.²⁵ The unit must meet physical standards in order to prevent government money from subsidizing substandard and unsafe units. Any landlord can refuse to rent out to Section 8 tenants, thus making the Section 8 market smaller than the general renting market.

²³ Ibid.

²⁴ National Center for Healthy Housing. (57) 2009. *Housing Interventions and Health: A review of the Evidence*. January.

²⁵ Schwartz, Alex F. 2010. (177) *Housing Policy in the United States, Second Edition*. 2nd ed. T & F Books US, February 8.

Although the existence of vouchers is an improvement from previous federal efforts, such as slum clearance, that did not include mechanisms to help displaced tenants, the voucher program does not necessarily support tenants completely. Section 8's emphasis on relocation does not take into account the non-monetary value a participant might place on their community or the mental health impacts relocation may cause for these same participants. Furthermore, the voucher program acts to move tenants out of unsafe conditions, but it does not include a proactive mechanism to ensure landlord action and code compliance across the entire housing stock. By not proactively improving conditions, Section 8 falls short of preventing the proliferation of slum housing conditions at large.

The urban renewal and slum clearance programs of the first half of this century, HOPE VI, and Section 8, provide us with a great example of a well-intentioned policies missing the mark. Slum clearance may discontinue slum conditions, but they do not fully protect tenants. HOPE VI may improve conditions, but it does not ensure tenants will have a place to return. Section 8 does not take into account the effect of displacement on a community or on the mental well-being of its participants. The actions taken by these policies simply did not create changes with a holistic or just approach. By displacing these extremely low-income tenants, these programs are counter-productive to ensuring their rights to safe and fair housing. Taking a closer look at these programs highlight the importance of utilizing a human rights framework when creating or analyzing policies to deal with the slum housing problem.

Housing and Health

The relationship between housing and health has been revived as a conversation within the public health community in the last twenty years and has resulted in a resurgence of studies documenting the effects that substandard housing conditions such as peeling and chipping of paint, mold and mildew caused by leaking pipes and inadequate drainage and ventilation, structural issues such as holes in the walls or roofs of buildings, lack of heat or hot water, and the presence of pests such as bedbugs, cockroaches, and vermin have on tenants. Due to the limitations of these studies and housings role as an upstream social health determinant, progress to create policies that effectively ensure the health of tenants has been stalled. By exploring these limitations one can better understand the lack of intense public outcry and proactive government interventions.

Data collected is limited due to the complex nature of housing problems and health. Recognizing this complexity, studies tend to be specifically tied to one aspect of housing and one aspect of health and rarely does one study catalogue the cumulative or multiple health effects housing may have on a tenant. Countless studies describe the connections between a single household condition and a single health effect, but rarely, if ever, do these findings conclusively define how housing conditions overall affect individuals. Thomson et. al (2001) attributes the inconclusive nature and limitations of these studies to methodological limitations that are unable to precisely measure and specify the nature and size of health gains resulting from improving just one aspect of housing.

Regardless of these methodological limitations, the public health community, community organizations, and researchers continue attempts to clarify the role housing can play in securing a healthy life for an individual. In regards to the fractured studies, Mary Shaw posits that “in some ways the evidence base can be characterized as piecemeal... [that]... when amalgamated... it can be argued that housing now affects health in a myriad of relatively minor ways, in total forming one of the key social determinants of health.”²⁶ In spite of scientific complexity and multifaceted nature of individual health, the fight for tenant rights continues. In order to fight slum housing, non-profits and community organizations such as the Healthy Neighborhoods Healthy Neighbors Collaborative have used tenant narratives as a way to move beyond the research limitations and explore the connections between housing and health in a less scientific, and more personal manner. A close reading of these reports and narratives displays the health effects of poor housing in an extremely personal and moving manner. Narratives such as these provide information to fill the gap left in the wake of scientific studies that have so far been unable to capture the complexity of the issue while simultaneously documenting the lived experience of tenants that is often overlooked at the policy level.

Furthermore, slum housing conditions rarely exist within a vacuum as they disproportionately effect those of lower socio-economic status due to a lack of affordable and safe housing options. When slum housing inhabitants are also low-income, their health cannot be solely attributed to housing conditions further complicating definitive

²⁶ Shaw, Mary. 2004. *Housing and Public Health*. Annual Review of Public Health 25.1: 397-419.

research conclusions connecting housing conditions to health.²⁷ Individuals living in slum housing conditions who are also low-income might also deal with obstacles in trying to secure adequate healthcare, secure healthy and affordable food, the effects of environmental racism, or the countless other issues that negatively affect the health of low-income individuals.

Unpacking social health determinants has the potential to concretely improve housing, and subsequently improve health conditions. Social health determinants can be categorized into two different types: upstream determinants and downstream determinants. Downstream determinants are the immediate conditions, which affect an individual's health. These are on the individual behavioral level and include such things as exercise or healthy eating. Upstream social determinants, such as housing are more difficult to define as social determinants due to the distance that may exist between an underlying cause and an apparent health affect. Examples of other upstream determinants are access to personal resources such as education, healthcare, an individual's income, as well as the neighborhood someone may live in as well as the housing environment.^{28 29} The importance of addressing slum conditions reveals itself as a priority when housing is recognized as an upstream health determinant. The following health impacts illustrate the relationship between this upstream determinant and tenant health.

²⁷ Thomson, Hilary, Mark Petticrew, and David Morrison. 2001. "Health Effects of Housing Improvement: systematic review of intervention studies." *BMJ* 323 (July 28): 187-190.

²⁸ Woolf, Steven and Paula Braveman. 2011. "Where Health Disparities Begin: The Role of Social and Economic Determinants- and why current policies may make matters worse." *Health Affairs* 30 (10) (October): 1852-1859

²⁹ Gibson, Marcia, Mark Petticrew, Clare Bambra, Amanda Sowden, Kate Wright, and Margaret Whitehead. 2011. "Housing & Health Inequalities: A synthesis of systematic reviews of interventions aimed at different pathways linking housing and health." *Health & Place* (17): 175-184

Indoor Air Quality and Respiratory Effects

In the United States allergy-caused asthma is estimated as accounting for upwards of 80% of all childhood asthma cases.³⁰ Comprehensive numbers regarding how many of these cases can be attributed to factors in the home environment due to the methodological limitations discussed earlier.³¹ Although the extent to which slum housing conditions cause asthma is unknown, it has been proven that asthma can be caused by chronic exposure to allergens and can result in severe symptoms and asthma attacks.³² Within the home, the presence of mold, mildew, mice, rats, and cockroaches can intensify and cause allergic asthma.³³

These contributing factors have a close relationship with housing conditions, and by landlord negligence. Code violations such as the presence of leaking pipes and faucets, inadequate drainage, inadequate ventilation, holes in the walls or roof, and inadequate weatherproofing create conditions best suited to grow mold, mildew, and attract dustmites. These conditions directly lead to an increase of indoor allergens.³⁴ Structural deficiencies, such as holes in the walls or ceiling, can also contribute to the presence of cockroaches, which also increase the presence of allergens. The presence of uncontrolled cockroaches can also force tenants to use indoor pesticides in hopes of

³⁰ Breysee, Patrick, Nick Farr, Warren Galke, Bruce Lanphear, Rebecca Morley, and Linda Bergofsky. 2004. "The Relationship between Housing and Health: Children at Risk." *Children's Health* 112 (15). Environmental Health Perspectives (November).

³¹ Ibid.

³² Matte, Thomas, and David Jacobs. 2000. "Housing and Health- Current Issues and Implications for Research and Programs." *Journal of Urban Health: Bulletin of the New York Academy of Medicine* 77 (1) (March).

³³ Lowe, Albert, Gilda Haas, and eds. 2007. *Shame of the City: Slum Housing and the Critical Threat to the Health of L.A. Children and Families*. Los Angeles: Strategic Actions for a Just Economy, April.

³⁴ Ibid.

ending the infestation without knowing that many of these pesticides are shown to exacerbate asthma.³⁵

Asthma hinders an individual's ability to gain a proper education, participate in everyday activities, as well as acts to increase healthcare costs. In the United States, asthma is the leading cause of pediatric emergency room visits, hospitalizations, lost workdays, and the primary cause for school absenteeism.^{36 37} These effects decrease a child's ability to succeed in school - an important factor that can support a child's access to upward mobility through access to advanced education. Those who grow up in slum conditions are more likely to be exposed to indoor allergens making them more susceptible to asthma and further disadvantaged in our society.

Rashes and Infections

The presence of mold and mildew is also correlated with likelihood an individual will contract painful rashes. Again, a landlord's actions relate to this health effect in that inadequate plumbing prone to leaks creates stagnant water sources that can cause high rates of mold and mildew in a unit or complex. Long periods of exposure to mold and mildew, increase the probability that an individual will contract chronic dermatitis or acute fungal infections.³⁸ Inadequate action to end infestations of rats, mice, fleas, and bedbugs can also all lead to tenants being bitten. Frequent bites that are left untreated

³⁵ Raugh, Virginia, Philip Landrigan, and Luz Claudio. 2008. "Housing and Health: Intersection of Poverty and Environmental Exposures." *New York Academy of Sciences*. Doi:10.1196.

³⁶ Ibid.

³⁷ Matte, Thomas, and David Jacobs. 2000. "Housing and Health- Current Issues and Implications for Research and Programs." *Journal of Urban Health: Bulletin of the New York Academy of Medicine* 77 (1) (March).

³⁸ The Healthy Neighborhoods Same Neighbors Collaborative. *Shame of the City- The Sequel- Slum Housing: L.A.'s Hidden Health Crisis (Enhancing Community Health by Improving Housing and Health Practices, Aligning Government Priorities and Increasing the Power of Tenants)*.

may result in abscesses, impetigo, or extreme discomfort. The presence of such pests may be due to structural issues, such as holes in walls or floorboards, or inadequate action being taken to end an infestation. These health effects are preventable if a landlord maintains rental units up to code.

Mental Health

Limited research is available connecting mental health and housing conditions. This is primarily due to the multifaceted nature of stress and mental health. As stated earlier, individuals living in low income slum housing are often dealing with multiple stressors in their lives that extend beyond the housing quality resulting in inconclusive research on the specific nature between the two. Qualitative data and self-reporting has, on the other hand, shown a correlation between mental health and housing conditions.^{39 40}

Detrimental mental health effects have been connected to at least one aspect of substandard housing: bed bugs. In response to bed bugs infestations, it is common for individuals to deal with anxiety, stress, insomnia, and even depression.⁴¹ It is important that more research be conducted regarding the connection between housing and mental health in order to better understand the problem and look towards possible program and policy solutions.

³⁹ Lowe, Albert, Gilda Haas, and eds. 2007. *Shame of the City: Slum Housing and the Critical Threat to the Health of L.A. Children and Families*. Los Angeles: Strategic Actions for a Just Economy, April.

⁴⁰ The Healthy Neighborhoods Same Neighbors Collaborative. *Shame of the City- The Sequel- Slum Housing: L.A.'s Hidden Health Crisis (Enhancing Community Health by Improving Housing and Health Practices, Aligning Government Priorities and Increasing the Power of Tenants)*.

⁴¹ Eddy, Christopher, and Susan Jones. 2011. "Bed Bugs, Public Health, and Social Justice: Part 1, A Call to Action." *Journal of Environmental Health* 73 (8) (April): 8-14

Lead Poisoning and Cognitive Development

Lead paint was outlawed on a national scale in 1978, due to scientific evidence proving the neurotoxicity of the substance. Although new paint no longer has lead in it, houses built and painted prior to 1978 may still contain lead paint. In most cities, these older buildings with lead based paint can be a danger for tenants. As a result of improper maintenance and negligent upkeep residents of these homes are susceptible to paying the price of this negligence with a hindered cognitive ability.

Children are especially susceptible to cognitive effects caused by lead poisoning and often suffer developmentally due to prolonged exposure. As a neurotoxin, lead hinders the developmental processes of children.⁴² Numerous studies have shown that lead poisoning has the ability to lead to brain damage, kidney disease, and nerve damage.⁴³ For children, this can hinder their ability to succeed educationally before they even step foot into a classroom.

Lead poisoning prevention programs have recently been downsized. In 2012, Congress cut the lead paint remediation budget by 94% causing it to go from it went from \$30 million to a mere \$2 million. In effect this budget cut is fatiguing hundreds of thousands of urban children with persistent cognitive damage and elevated blood pressure for life.⁴⁴

By not taking direct action in order to prevent the permanent cognitive damage,

⁴² Abelsohn, Alan, and Margaret Sanborn. 2010. "Lead and children." *Canadian Family Physician* 56. Environmental and Health Series (June): 531-535.

⁴³ The Healthy Neighborhoods Same Neighbors Collaborative. *Shame of the City- The Sequel- Slum Housing: L.A.'s Hidden Health Crisis (Enhancing Community Health by Improving Housing and Health Practices, Aligning Government Priorities and Increasing the Power of Tenants)*.

⁴⁴ Montague, Peter. 2012. "One of Congress's Most Damaging (and Racist) Budget Cuts That Flew Under the Radar." *AlterNet*, February 7.

http://www.alternet.org/environment/154005/one_of_congress%27s_most_damaging_%28and_racist%29_budget_cuts_that_flew_under_the_radar/?page=1.

Congress, is, in essence, contributing the rates of school drop outs, youth crime, and the school-to-prison pipeline.⁴⁵

Lead poisoning is preventable when proper measures are taken to ensure this. Living in a building that was at one point painted with lead paint will not necessarily lead to the tenants of that complex being poisoned. Exposure can be caused by old peeling paint or through construction that does not take adequate safety measures to avoid the risk of exposing tenants. Remediation programs are integral to guaranteeing that this information reaches landlords so they can take appropriate safety measures.

⁴⁵ Ibid.

Summary of Health Effects as tied to Slum Housing Conditions

<u>Health Symptom</u>	<u>Slum Housing Condition</u>	<u>Long Term Health Impact</u>
Lead Poisoning	Peeling and chipping paint Paint dust from opening windows and doors	Brain damage Kidney disease Nerve damage
Asthma and Respiratory problems	Mold and mildew, caused by leaking pipes, inadequate drainage, inadequate ventilation, holes in walls or roof and inadequate weatherproofing Cockroach droppings Dust Mites and other triggers found in old carpets	Asthma attacks Chronic bronchitis Chronic pneumonia Eye problems, conjunctivitis Allergic rhinitis Chronic sinusitis
Dead cockroach body parts in ears	Cockroach infestation	Ear infection Tinnitus Staph infections Yeast infections
Infection, viruses	Rat bites Lice and bedbugs Flea bites	Anaerobic infections can cause loss of fingers, toes or limbs Hantavirus causes strain of pneumonia that leads to respiratory failure and death Viremia Impetigo Abscess
Skin rashes and fungal infections	Fleas from rats and birds Infested and dirty old carpets Leaking water and humidity Leaking sewage	Chronic dermatitis Acute fungal infections and rashes
Chronic colds	Leaking pipes, inadequate drainage, inadequate ventilation, holes in walls or roof and inadequate weatherproofing	Lowered immune system Colds Ear infections Pneumonia
Stress, Depression	Constant health problems due to uncorrected housing conditions Harrassment Evictions Threats Physical and sexual harassment	Hypertension which can cause chronic headaches, cardiovascular problems that later lead to stroke and heart attacks Depression leads to poor diet which, in turn, exacerbates depression
Staph Infections	Shared bathrooms, not maintained Lack of heat and hot water	Extremely contagious Potentially fatal for immuno-compromised patients

(Chart taken from The Healthy Neighborhoods Same Neighbors Collaborative. *Shame of the City- The Sequel- Slum Housing: L.A.'s Hidden Health Crisis*)

Los Angeles Housing Statistics

Every four years, the U.S. Department of Housing and Urban Development (HUD) and the U.S. Census Bureau come together to conduct research cataloging the state of housing conditions in all major metropolitan areas in the American Housing Survey and can provide a clear view of the state of housing in these metropolitan areas. In fact, when research was conducted on the state of slum housing in Los Angeles in 1997, the 1995 American Housing Survey was used to substantiate claims regarding the extent of the problem.⁴⁶ Although the American Housing Survey has yet to release a report since the 2008 recession, a closer analysis of the 1995 American Housing Survey for Los Angeles-Long Beach Metropolitan Area and the subsequent 2003 study exemplify the current housing issues.⁴⁷ I hypothesize that the housing crisis only increased the deleterious and unsafe housing conditions as a byproduct of increasing foreclosures and landlords being unable to maintain rental properties up to code. Due to foreclosure crisis and recession, it can be assumed that the numbers relating to substandard housing in the 2003 American Housing Survey are much lower than today's.

Although the American Housing Survey is not specific to Los Angeles city, as it includes the greater metropolitan area, and although it does not encompass every important tenant issue, taking a closer look at these surveys can bring to light the reality of substandard housing conditions and their frequency. Historically, the American Housing Survey has played an important role within the Los Angeles slum housing issue as its numbers were used for the basis of the 1997 Blue Ribbon Citizen's Committee

⁴⁶ Adams, Mark, Gary Blasi, and et al. 1997. *The Slum Housing Problem In Los Angeles and The Department of Building and Safety- Interim Report Number 1 of the Blue Ribbon Citizens' Committee on Slum Housing.* (9). July 28.

⁴⁷ It is imperative that a new study be conducted in order to understand the current state of housing and how the recent recession may have affected housing quality for Los Angeles tenants.

report that lead to the creation of slum housing enforcement policies such as Los Angeles Housing Department's Systematic Code Enforcement Program.

In the 1995 AHS survey, there were a total of **156,400 rental units** in substandard conditions. According to the AHS substandard conditions include units dealing with both moderate and severe physical problems.⁴⁸ In 2003, the number of rental units in substandard conditions jumped to an astounding **210,600 rental units**. Furthermore, over 116,000 of these units were dealing with rodent infestations.⁴⁹ These substandard conditions are directly correlated with negative tenant health effects as described earlier. To survey for substandard living conditions, the American Housing Survey surveys for two categories- units with “severe physical problems” and units with “moderate physical problems”. They are specifically defined below.

“Moderate Physical Problems” ⁵⁰ as defined by American Housing Survey	“Severe physical problems” ⁵¹ as defined by American Housing Survey
<p>Having any of the following problems, but none of those found under “severe physical problems”:</p> <ul style="list-style-type: none"> -Inadequate plumbing (repeated broken flush toilets) -Unsafe heating (unvented gas, oil, or kerosene) -Lack of a properly equipped kitchen - Any three of the four “severe physical” hallway conditions - Any three of the severe general maintenance criteria under “severe physical upkeep” 	<p>Having any of the following problems:</p> <ul style="list-style-type: none"> - Inadequate plumbing (lack of bathtub, shower, hot or cold water) - Inadequate heating (cold for over 24 hours or having broken down three times in a given winter) - Inadequate electricity (exposed wiring, repeated tripped circuit breakers) - Unsafe hallway conditions (lack of lighting, missing steps, etc) - General maintenance failures (water leaks, open holes or cracks, excessive peeling paint, or rats)

⁴⁸ U.S. Census Bureau. *American Housing Survey for the Los Angeles-Long Beach Metropolitan Area: 1995*. Current Housing Reports.

⁴⁹ U.S. Census Bureau. American Housing Survey for the Los Angeles-Long Beach Metropolitan Area: 2003. Current Housing Reports. Table 4-7

⁵⁰ U.S. Census Bureau. American Housing Survey for the Los Angeles-Long Beach Metropolitan Area: 2003. Current Housing Reports. Appendix A A-20

⁵¹ U.S. Census Bureau. *American Housing Survey for the Los Angeles-Long Beach Metropolitan Area: 2003*. Current Housing Reports. Appendix A A-19

Los Angeles Policy: A Case Study

The following section outlines the city of Los Angeles slum housing enforcement policies case study. It provides a reader with an overview of the history of affordable housing and slum issues, a description of the Los Angeles Housing Department, as well as a description of the Systematic Code Enforcement Program and the Rent Escrow Account Program.

Los Angeles and Affordable Housing

The connection to slum housing conditions and affordable housing is undeniable. When faced with an unaffordable housing stock renters must sometimes make concessions; choosing substandard, unsafe, or overcrowded units or paying over 30% of their income on housing and thus becoming rent-burdened. One way to promote affordable housing, and thus combat slum housing, is through enacting rent control. Rent control is one of the strongest government-based initiatives that can regulate the prices of rental properties and protect affordability. Rent control often is paired with other tenant supportive regulations that may protect tenants against unfair evictions or harassment. At one point the city of Los Angeles had a rent control program, but due to political battles between groups supporting tenants and landlord groups, Los Angeles is now under Rent Stabilization Ordinance (RSO) – a diluted form of rent control that favors landlords. Throughout California's history, tenants and landlords have battled over what is a fair rental market and how to balance the needs of tenants with landlords want of profits.

In reaction to a Supreme Court case in 1985 that strengthened tenant support and increased the difficulty of landlords to evict tenants, the state of California passed the

Ellis Act. The Ellis Act made it illegal for cities to take action in order to prevent a landlord from going out of the rental business. “Going out of business” in this case referred to a landlord converting their rental units to condominiums by evicting current tenants in order to bypass rent control provisions and provide landlords with a means to increase profits through the luxury condominium market. Converting rental units to condominiums takes affordable rental units out of the housing stock, redevelops them, and then increases the stock of unaffordable luxury units for sale. These evictions were allowed as long as landlords did not evict the tenants, redevelop the land, and turn around and rent out the properties at higher values for increased profit. It only held up if landlord’s were “going out of the rental business” through condominium conversions.

Due to pressure from city organizations such as the Coalition for Economic Survival, ACORN, the Los Angeles Community Action Network, L.A. Voice, Coalition L.A., L.A. Coalition to End Hunger & Homelessness, Inquilines Unidos and East Los Angeles Community Corp., the Los Angeles City Council came down on a landlord loophole in 1997, in which landlords were demolishing rental units, redeveloping them, and converting them to the private market against the tenets of the Ellis Act.⁵²

In 1996, the state of California passed the Costa Hawkins Act and the strength of rent control in California. Costa Hawkins rendered vacancy control illegal. Vacancy control is an aspect of most rent control programs that regulates the renting price of unit when old tenants move and before new tenants. This prevents affordable units from becoming market rate and unaffordable. Costa Hawkins single handedly ended the

⁵² Dreier, Peter. 1997. “L.A. renters strike back.” *Los Angeles Times* <http://www.latimes.com/news/opinion/commentary/la-op-dreier27may27.0.6176874.story>. (May)

strength of rent control programs by rendering vacancy control illegal and thus weakening one of the strongest affordable housing preservation tools tied to rent control.

Without rent control, California cities have attempted to remain supportive of tenants and affordable housing through a myriad of regulations and ordinances. In Los Angeles, this has resulted in the Rent Stabilization Ordinance, or RSO. In Los Angeles all multi-unit rental properties built prior to 1979 are under RSO. RSO is not as stringent as rent control and instead of preventing rental increases through a rent freeze RSO predetermines an amount by which rents can increase each year based on rates of inflation and not changes in the rental market. This regulation is stronger than in a place where no rent control exists, but is not as strong as cities that have complete rent control, such as New York and West Hollywood. Once tenants vacate a unit, the rent may be moved to market rate, but again, can only increase annually by the pre-determined RSO rates. The Los Angeles Housing Department describes the purpose of RSO as “to protect tenants from excessive rent increases, while at the same time allowing landlords a reasonable return on their investments.”⁵³ Within this purpose statement, protection of tenants rights is put into direct conflict with the protection of a landlords investments.

Blue Ribbon Citizen's Committee

In 1997 Blue Ribbon Citizens Committee on Slum Housing brought tenant slum housing issues to the forefront of the public agenda in Los Angeles by releasing a report cataloguing the state of rental housing and analyzing the effectiveness of the Department of Building and Safety, the entity in charge of code violations, at addressing slum

⁵³ Los Angeles Housing Department. City of Los Angeles. Rent Stabilization Ordinance. <http://lahd.lacity.org/lahdinternet/RSO/tabid/263/language/en-US/Default.aspx>.

housing conditions. This committee was composed of 22 individuals ranging from public interest attorneys, affordable housing developers, religious leaders, professors and graduate students at the UCLA School of Law and UCLA School of Public Policy and Social Research.

Through analysis of public records documents and interviews, the Blue Ribbon Citizen's Committee has several major findings. They found that 1) The problem of slum housing in Los Angeles was growing 2) No single cause can be pinpointed for slum housing and stereotypes of landlords and tenants can be misleading, rather it is a mixture of enforcement failures, lack of landlord resources, and some landlords which seek to maximize profits 3) Department of Building & Safety's housing codes and code enforcement of the time presented few incentives for owner code compliance 4) The system lacked pro-active and preventative tactics and instead focused on dealing with consequences of slum conditions 5) The law system is not flawed, but instead the proliferation of dangerous conditions can be attributed to enforcement of the laws 6) Department of Building & Safety enforcement efforts are ineffective due to a lack of prioritization, a confusion of jurisdiction, a lack of follow up on specific cases, the fact that the system lacks a systematic aspect and rests on complaints, the lack of an information management system.⁵⁴

The publication of this report and these findings lead to increased public pressure upon the City of Los Angeles that resulted in the reorganizing of jurisdiction in the city as well as the creation of the Systematic Code Enforcement Program, a program based not on complaints, but a systematic inspection system of rental units. Due to this report, slum

⁵⁴ Adams, Mark, Gary Blasi, and et al. 1997. *The Slum Housing Problem In Los Angeles and The Department of Building and Safety- Interim Report Number 1 of the Blue Ribbon Citizens' Committee on Slum Housing.* (27). July 28.

housing enforcement, for multi-unit rentals, moved from being under the Department of Building & Safety to that of the newly created Los Angeles Housing Department.

Although the Blue Ribbon Citizen's Committee took action almost fifteen years ago, its success is still understood as one of the most important moments in slum housing for the city of Los Angeles. Bill Pitkin, in a presentation at the Association of Collegiate Schools of Planning (ACSP) Conference in Baltimore, Maryland in 2002, attributed the success of the Blue Ribbon Citizen's Committee to four factors; the framing of the slum housing as a moral issue with slumlords as identifiable causes, the social and political landscape resulting from the recent economic downturn, a cooperative and collaborative relationship between City Council members and the Mayor, and the sophisticated strategy of a broad-based coalition of public interest attorneys, tenant organizers, community activists, and city staff members.⁵⁵

The Los Angeles Housing Department

The Los Angeles Housing Department, or LAHD, is the primary entity involved in slum housing issues throughout the city of Los Angeles. Although LAHD is not the only entity involved in slum housing issues, I have primarily focused on its role as it applies most specifically to my city-focused research question.⁵⁶ The Los Angeles Housing Department "is charged with the development of citywide housing policy and supporting safe and livable neighborhoods through the promotion, development and

⁵⁵ Pitkin, Bill. 2002. Did I say slums? Housing Reform in the City of Los Angeles presented at the Association of Collegiate Schools of Planning (ACSP) Conference, November 23, Baltimore, Maryland.

⁵⁶ Research Question: "According to tenant organizers and advocates, how can the City of Los Angeles strengthen its housing code enforcement policies in order to best protect the health and human rights of Los Angeles tenants?"

preservation of decent and affordable housing.”⁵⁷ Under this mission, LAHD runs two of the most effective slum housing enforcement policies found in the City. These two programs are called the Systematic Code Enforcement Program, also known as SCEP, and the Rent Escrow Account Program, also known as REAP. These two programs are laid out in detail below.

The Systematic Code Enforcement

In response to the reactions of the public and community groups to the Blue Ribbon Citizen’s Committee report, the City launched into action and created the Systematic Code Enforcement Program, a one of a kind, non-complaint driven code enforcement program to inspect rental properties for issues of habitability and safety. The responsibility of monitoring rental properties with two or more rental units was transferred from the jurisdiction of the Department of Building and Safety to that of Los Angeles Housing Department.

SCEP has since been recognized for it’s innovation in being non-complaint driven and success. In 2005, the program was the winner of the “Innovations in American Government Award” by Harvard University’s Kennedy School of Government. SCEP is primarily funded through the \$43.32 fee collected annually from each unit in the Systematic Code Enforcement Program, regardless of whether or not the unit is inspected that year.⁵⁸ Since its inception, SCEP has sought to fund itself through its own activities

⁵⁷ Los Angeles Housing Department. City of Los Agneles. Mission Statement.

<http://lahd.lacity.org/lahdinternet/AboutUs/MissionStatement/tabid/120/language/en-US/Default.aspx>.

⁵⁸ Los Angeles Housing Department. CEU - Programs.

<http://lahd.lacity.org/lahdinternet/CodeEnforcement/Programs/tabid/390/language/en-US/Default.aspx>.

(ie fee collection), with emphasis placed on funding coming from those who violate the regulations (landlords), rather than those who suffer in light of code violations (tenants).⁵⁹

Through SCEP the Los Angeles Housing Department seeks to systematically inspects all rental properties within the city that fall under RSO. SCEP seeks to address safety concerns surrounding sanitation and habitability. Single unit rentals are not covered under the Systematic Code Enforcement Program and remain under the jurisdiction of the Department of Building and Safety. No agency or program oversees all slum properties so properties remain under the jurisdiction of whichever entity they fall under regardless of habitability issues.

As a goal, SCEP seeks to inspect each multi-family rental unit every four years. Although it is not complaint-driven, formal complaints can be filed either online through the LAHD website, reported via phone directly to LAHD, or filed in person at an LAHD office to trigger inspections prior to the four year cycle date. Tenants incur no charges for filing a report, ensuring accessibility of LAHD intervention to tenants regardless of financial situations.

According to the official LAHD website, LAHD mails notifications informing landlords of the upcoming inspections and SCEP inspectors post notices to units to inform tenants of the upcoming inspections 5-7 days prior to the scheduled inspection date.⁶⁰ The city has contracted out various non-profits to provide tenant outreach prior to these inspections in order to help tenants better understand the inspection process.

⁵⁹ Adams, Mark, Gary Blasi, and et al. 1997. *The Slum Housing Problem In Los Angeles and The Department of Building and Safety- Interim Report Number 1 of the Blue Ribbon Citizens' Committee on Slum Housing*. July 28.

⁶⁰ Los Angeles Housing Department. CEU - Programs.
<http://lahd.lacity.org/lahdinternet/CodeEnforcement/Programs/tabid/390/language/en-US/Default.aspx>.

Properties are inspected on the basis of the State and City codes and regulations regarding housing and any violation is written up, posted on the unit, and a copy is mailed to the landlord. This is called a Notice and Order to Comply and it informs the property owner of the code violations found in the inspection. A sample of this can be found in the Appendix. Property owners have 30 days from the day the Notice to Comply is posted to resolve these code violations. Once the compliance period has expired, inspectors re-inspect units and if compliance has not been met, the owner is summoned to a General Manager's Hearing at LAHD. The goal of the General Manager's Hearing is to discuss the non-compliance and to specify a plan of action for when these repairs will be completed. If repairs do not result from this process, then further action can be taken. If this occurs, the file may be sent to the Office of the City Attorney as a criminal complaint and it becomes eligible for prosecution. The property also becomes eligible for LAHD's Rent Escrow Account Program.

The Rent Escrow Account Program

The Rent Escrow Account Program, also known as REAP, was created in 1989 to encourage repairs and maintenance in residential rental units throughout Los Angeles. When a property is placed in REAP, tenants are given the option to pay rent into an escrow account instead of to the property owner. REAP seeks to incentivize remedying code violations by cutting off a property owner's cash flow until these violations are abated. These funds remain unavailable to the property owner unless used to subsidize repairs.

According to Los Angeles city REAP regulations, when a property is placed in REAP tenants become eligible for rent reductions dependant on the severity of their living situations. Rent reductions can range from 10% to 50% and are dependant on the severity of the violations. Rent reductions are determined while a property moving into REAP. Although landlord isn't receiving funding regardless, REAP runs on the premise that eventually a landlord will receive funding and therefore a rent reduction incentivizes bringing a property up to code.

Sections 1200.03 through 1200.12 of the Rent Escrow Account Regulations outline the process a property must go through to enter REAP. For a property to be eligible for REAP it must be the subject of one or more orders to comply, the period of compliance must expire without proper action being taken, and if the violations affect the health and safety of occupants. Under these circumstances a property may be referred to REAP by either a tenant or an enforcement agent. Once LAHD verifies that the property does fulfill the above requirements, the property can be accepted into REAP. Acceptance will trigger LAHD to inform the landlord in a written determination. Upon receiving this, the property owner has 15 days to formally appeal this decision. Once this appeal is received LAHD must schedule a General Manager's Hearing within 30 days. Tenants and landlords must be notified via mail of the General Manager's Hearing seven days prior to the hearing. The General Manager's Hearing provides a space for tenants and landlords to present relevant evidence to argue for or against the placement of the property into REAP.

The Hearing Officer's decision regarding the property must be mailed to landlords and tenants within 10 days of the original hearing. The General Manager's

decision can be appealed to the Appeals Board if a written appeal is sent within 10 days upon receipt of the Hearing Officer's decision. The Rent Escrow Account Program Regulations provide no time frame for when the Appeals Board must conduct its hearing. After the hearing, the Appeals Board must render a written decision within 15 days and this will constitute the final administrative decision regarding whether or not the property will enter REAP. If the Appeals Board finds the property to qualify for REAP, LAHD must establish an escrow account for rental payments within 5 days.

All in all, the process to move a property into REAP can take up to 65 days. This 65 day period does not include the 30 day non-compliance period that must first be exhausted before the process can begin. This lengthy process protects landlords from unjustly losing profits, but it also prevents tenants from attaining their rights to a healthy and safe home. Tenants living in a property eligible for REAP, must either remain in untenantable, slum conditions and continue to pay rent for upwards of three months before REAP is even instituted or they must move. This process lends itself to a situation in which a tenant must continue to pay for substandard and unsafe conditions if they wish to remain in their unit. Compounded with a lack of affordable housing, tenants have little agency in controlling their own living conditions. If they are living within a property under REAP, then the only action they can take against the landlord is to fight for a rent decrease or wait it out and hope the landlord eventually complies with the Order to Comply.

Although REAP is the City's strongest slum housing enforcement program, it does not include regulations regarding a maximum duration period within which a property can remain in REAP. REAP instead relies on the concept of landlord incentives

in order to encourage slum housing abatement. The restriction of cashflow, in theory, encourages property owners to repair code violations. The accruing funds in the escrow account are inaccessible to the owner, unless used to make such repairs. Once a property is moved into REAP, tenants living in such conditions must wait until the landlord makes the decision to repair their unit.

REAP, SCEP, and Slum Housing: A Closer Examination

Through conducting research I took a closer look at the Systematic Code Enforcement Program, the Rent Escrow Account Program and the general landscape around slum housing in Los Angeles. In sifting through and reorganizing the information collected I have organized my findings into found two main categories. The first category relates to the structure of the programs already in place and is of a small scope. It includes: interagency relations, inspector training, inspection protocol, enforcement issues, and funding issues. The second category of my findings relates less directly to program structure and focuses on the broader landscape of slum housing issues. This section includes a discussion of the affordable housing, the foreclosure crisis, the role of elected officials and public awareness, and the role of non-profits. The following sections seek to break down where these policies, regardless of their innovation, fall short and where they can be improved to better meet the needs of tenants in order to create a city that can live up to its mission and ensure the human rights of all are secured.

INTERAGENCY: JURISDICTION, COMMUNICATION, AND COLLABORATION

According to my research with tenant organizers and advocates, habitability problems within Los Angeles are difficult to address due to the fact that over five different departments and bodies hold some type of jurisdiction regarding slum housing problem. Stemming from this overlap I've found a lack of coordination regarding jurisdiction between agencies and a lack of effective communication amongst them. In

unpacking this complexity, I realized the limited nature of my research question.⁶¹ When initially investigating slum housing issues I focused on the role of LAHD, as a city entity, and did not take into account the bureaucratic mess caused by involvement of several agencies at different government levels and how that related to the level of protection that Los Angeles tenants were receiving.

Every individual interviewed shared some type of frustration regarding the disjunction that exists between these different agencies. Interview subjects cited the “lack of coordination,”⁶² ⁶³ “lack of communication,”⁶⁴ and “communication as not common,”⁶⁵ as all contributing to our slum housing problem in Los Angeles. Cynthia Guzman, a Master’s Student of Public Policy at UCLA conducting research on the Los Angeles Housing Department’s Systematic Code Enforcement Program, summed the situation up best when she commented that these agencies, “don’t work cooperatively, they work in silos, even if they all have the same mission.”⁶⁶ Although, as government agencies, they share the mission of protecting residents, these departments do not collaborate with one another to maximize effectiveness. This is extremely confusing when the city at one point instituted a Slum Housing Taskforce in reaction to slum housing moving to the forefront of the general public’s mind and in order to cut down on bureaucracy to promote a more effective city front against slum housing. The Slum Housing Taskforce brought together individuals from different sectors, private and public, in order to improve tenant

⁶¹ Research Question: “According to tenant organizers and advocates, how can the City of Los Angeles strengthen its housing code enforcement policies in order to best protect the health and human rights of Los Angeles tenants?”.

⁶² Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

⁶³ Bustillo, Roberto. (Organizer, L.A. Voice) Interview. Apr 10 2012

⁶⁴ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁶⁵ Gonzalez, Favian. (Organizing Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁶⁶ Guzman, Cynthia (Master’s Student at UCLA School of Public Policy). Interview. Feb 27 2012

protections. As time has passed this Slum Housing Taskforce has lost steam and has become somewhat defunct.⁶⁷ In regards to the interactions between these agencies, Roberto Bustillo, an organizer at LA VOICE who has worked in Los Angeles housing issues for the past 10 years, commented that because of this interagency confusion “they put more emphasis on their bureaucratic needs, rather than on the family needs.”⁶⁸ This focus on bureaucracy ends up being in immediate contradiction with the Los Angeles Housing Department’s mission to effectively support tenants.

The multiplicity of government entities involved lends itself to this tangled web of bureaucracy resulting in a lack of immediate improvements in housing conditions. The following chart displays key agencies, the level of government they are run through, their involvement in the slum housing context as well as their primary responsibilities as an organization.

⁶⁷ Bustillo, Roberto. (Organizer, L.A. Voice) Interview. Apr 10 2012

⁶⁸ Ibid.

Departments involved in Los Angeles Slum Housing Issues

Government Level	Name	Involvement in Slum Housing	Primary Responsibilities
City	Los Angeles Housing Department	Jurisdiction over rental properties falling under RSO	General Housing Issues
	Department of Building and Safety	Single unit rental properties and construction oversight	Granting permits for construction and renovations. Business oriented.
County	Department of Public Health	Housing inspections for concerns that may effect the general public health	Primarily oversees businesses for public safety standards and concerns.
State	Division of Occupational Safety and Health	May be called in if slum conditions are affecting the work of individuals (ie construction work)	Labor issues and protection of workers.
	Department of Food and Agriculture	Deals with unsafe pesticide and fumigant usage	Monitors safety in agricultural system. Relationship to pesticides primarily farm focused.

On the city level the Los Angeles Housing Department as well as the Department of Building and Safety is involved. On the county level, the Department of Public Health must be involved to address vermin and pest infestation regardless of their relation to slum housing conditions. When tenants, non-profits, and community organizations are unable to adequately improve the slum housing problem through the Los Angeles Housing Department, the Department of Building and Safety, they must extend the scope of agency involvement. To address detrimental health effects caused by a misuse of dangerous indoor fumigants these tenant advocates must involve the Department of Agriculture, whose typical involvement with pesticides is agriculturally focused, or if a tenant's health is at-risk while an unsafe repair process is underway the Occupational

Safety and Health Administration must be involved.⁶⁹ This lack of a clear, organized, and central agency dealing with housing creates an environment where tenant issues can be shuffled around and avoided under the guise of “this isn’t our jurisdiction.”⁷⁰ Due to this shuffling, a tenant’s right to habitability is compromised. Without one entity being able to encompass all issues stemming from slum housing, tenants must navigate the complexity of bureaucracy in order to protect their rights to fair housing.

Jurisdiction issues also come about withinin city agencies. Although the city of Los Angeles has a Housing Department, there are properties within the city that are outside of LAHD’s jurisdiction. SCEP, for example, only covers multi-unit properties. Single-family rentals are instead under Los Angeles City’s Department of Building and Safety and therefore have no systematic code enforcement program regulating habitability. The Department of Building and Safety primarily focuses most of its time and energy on permits, construction, and is mainly business oriented. Regardless of the fact that single-unit rental properties may be under slum conditions, tenants must work with a department less tenant-focused than LAHD. The original Blue Ribbon Citizen’s Committee Report’s recommended inspection of rental properties be moved from the Department of Building and Safety to the Los Angeles Housing Department to ensure better protection for LA tenants.

Not only must multiple entities be involved to solve slum housing conditions, but a property may actually move back and forth between agencies. For example, when LAHD cites a property for a code violation, the property may not remain under its jurisdiction for the duration of the compliance period. Once a landlord begins

⁶⁹ See Appendix for Department Jurisdiction Chart

⁷⁰ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

construction and repairs, the property then moves to being under the jurisdiction of the Department of Building and Safety, and once repairs are finished it returns to being under the jurisdiction of LAHD. There currently exists no formal pathway between LAHD and the Department of Building and Safety to promote communication regarding code violations or standards as a property transfers jurisdiction. This back and forth shuffle breaks down the chain of command necessary to continuously support and protect tenants.⁷¹ It also shuffles a unit between departments that have no standardized agreement regarding health and safety standards.

California State Law is partially to blame for some of the jurisdiction confusion. Section 17930.3A12 of California State Law states that a unit is deemed substandard when a vermin or pest infestation is determined by a *health officer*.⁷² Greg Spiegel, the Director of Public Policy and Communications at Inner City Law Center who has worked with Los Angeles slum housing issues around lead remediation and through the Healthy Homes Collaborative, explained that the usage of the vague term “health officer” places identifying infestations under the jurisdiction of the Department of Public Health, as their employees are health officers, and does not provide LAHD inspectors, those who regularly work within rental units, with the same authority. Due to this clause LAHD inspectors are unable to cite substandard conditions relating to pest infestations creating a scenario where SCEP inspections occur, but do not result in the necessary outcomes to

⁷¹ Ibid.

⁷² California State Code 17920.3.12: “Any building or portion thereof including any dwelling unit, guestroom or suite of rooms, or the premises on which the same is located, in which there exists any of the following listed conditions to an extent that endangers the life, limb, health, property, safety, or welfare of the public or the occupants thereof shall be deemed and hereby is declared to be a substandard building: Infestation of insects, vermin, or rodents as determined by the health officer.”

address *any* health concern that may come about due to a pest infestation. This leaves tenants unprotected from conditions that may increase a tenant's exposure to rats, mice, bed bugs, and cockroaches. If the language were more inclusive to include LAHD inspectors, then Notice to Comply orders from LAHD SCEP inspectors could directly address the pest and vermin issues, and more effectively protect tenant health.

Furthermore, if language were altered it could also allow advocates from community groups as well as individuals from any of the other entities be involved in housing issues deem a unit substandard, then the necessary protocol used in regards to slum housing conditions. By amending this law, the need for involvement of the Department of Public Health would be rendered unnecessary and thus cut down the number of agencies involved needed to improve slum housing conditions.

Regardless of jurisdiction issues, agencies and departments use standards drastically different from one another resulting in different standards of inspection. In October of 2011 the Department of Public Health and Los Angeles Housing Department both inspected the same complex on Wall St. Taking a closer look at the results of these inspections illuminates the disconnect between agencies. Appendix B and Appendix C include the Notice to Comply order from LAHD on October 24, 2011 and the Department of Public Health's Housing Official Inspection Report on October 6, 2011. Although inspections were conducted merely two weeks apart, these inspectors could not have come to different conclusions. According to the Department of Public Health inspector units 102, 106, and 109 had no safety problems. Looking specifically at unit 102, two weeks later, the LAHD inspector cited this unit for 9 violations (presence of roaches, failure to prevent water damage, peeling paint, leaking plumbing, and failure to

maintain a positive seal between the plumbing fixtures and contact point). As discussed earlier, these conditions increase an individual's exposure to allergens, lead paint poisoning, and makes them susceptible to asthma, impetigo, and various other health concerns. A close comparison of these two documents illustrates a plethora of the ways in which these two inspections in no way reflect one another.

Not only do these agencies not agree regarding habitability status of a unit as seen above, but their assessments range in form from narratives to simple or extensive checklists. These different forms make it difficult to translate information across departments. The disconnect between inspections can partially be attributed to the technology gap that exists between departments. Whereas the Los Angeles Housing Department uses state of the art handheld computers to log citations and areas in need of repair, the Department of Public Health and the Department of Building & Safety and others use handwritten carbon paper forms.⁷³ This technology gap increases the difficulty for agencies to share information. As one can see, the LAHD report is succinct, easy to follow, and includes explanation where needed. It is also more in depth, to which I can assume be attributed to the ease at which the handheld computer makes logging high numbers of citations for multi-unit complex. The Department of Public Health inspection form, on the other hand, leaves little space for hand written comments and does not provide and inspector with adequate space to be as in-depth as the Los Angeles Housing Department inspector.

This lack of uniformity becomes particularly problematic when a unit transfers between agencies. Whereas Los Angeles Housing Department might cite a multi-unit

⁷³ Abood, Maya (Organizer/Grassroots Media Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

property for repairs post SCEP inspection, the Department of Building and Safety is involved during repairs, and only after repairs are completed does the Los Angeles Housing Department regain jurisdiction.⁷⁴ With each agency using different standards of habitability and with units moving in and out of agencies, the effectiveness of Los Angeles policies protecting tenants decreases. Maintaining a satisfactory level of repairs becomes even more difficult. In the midst of these jurisdiction debacles and the breakdown of interagency communication, it is the rights of the tenants that are put at risk and left at the mercy of being lost in translation.

ILLEGAL UNITS

The presence of illegal rental units throughout the city creates an obstacle for slum housing enforcement policies. An illegal unit is any unit used as a rental that is not verified by the Los Angeles Housing Department. These units may be improperly constructed or converted without proper legal paperwork, permits, or in some other way do not meet regulations for rentals in Los Angeles. These units may not meet regulations regarding size or amenities and can range from being comfortable and safe to dangerous and overcrowded. These units are rampant throughout Los Angeles due to the high rents and few affordable housing options. When these two factors collide, may find themselves in less than satisfactory conditions. These include those of slum housing, overcrowding, or living in an unofficial or illegal unit. In units such as these neither the Department of Building and Safety or the Los Angeles Housing Department have jurisdiction to cite code violations. Due to this jurisdiction issue, inspectors have been known to walk out of

⁷⁴ Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

units when their illegal nature is brought to their attention.⁷⁵ Although these units are illegal, by not taking action to address habitability, tenants are left without city support. Without any governing body having jurisdiction over these units, the health and safety of these tenants is left up to chance.

INSPECTOR TRAINING

The effectiveness of inspections was a constant source of discussion within interviews I conducted. Although the level of blame placed on inspectors differed greatly depending on who I was interviewing, consensus existed between the nine people that I interviewed regarding a lack of necessary training to make all inspectors, in all agencies involved, as effective as possible. Inspector training issues were divided into two categories: lack of uniform and in-depth training and illustrated the need for inspectors to be trained beyond issues of code enforcement.

To better understand inspector training I looked at the 2001 and 2007 city audit of LAHD's Systematic Code Enforcement Program. Within it's list of recommendations, the 2001 audit suggested that Los Angeles Housing Department "develop a training curriculum with competency standards and modules that all inspectors are required to complete within the first year or less of employment."⁷⁶ In the follow up 2007 audit, auditors found that LAHD had implemented a training as per the suggestion, but also found that "while the Department's actions satisfy the intent of this recommendation, it

⁷⁵ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁷⁶ Gary Bess Associates. 2001. *Los Angeles Systematic Code Enforcement Program Evaluation*. Audit. City of Los Angeles Office of the Controller, November 13. http://controller.lacity.org/Audits_and_Reports/index.htm.

should be noted that several inspectors stated that there are inconsistencies in the application of codes, indicating that more code training may be necessary.”⁷⁷

Although, SCEP and LAHD have not recently been audited, interviews conducted suggest that training has remained inadequate and has resulted in non-uniform inspections that differ by inspector.^{78 79 80} The result of units passing inspection when conducted by some inspectors while not passing when conducted by others creates a non-uniform enforcement and non-uniform protection of tenants rights to safe and livable housing conditions.^{81 82} This problem is not an LAHD problem. In fact, variations between inspectors in inspection quality was also reported within the Department of Building and Safety.⁸³ Without an intensive training program, inspectors *within* agencies are unable to produce uniform inspections. It is no wonder that interagency communication and collaboration is the problem that it is.

According to the Greg Spiegel, Director of Public Policy at Inner City Law Center, and Anne Farrell-Scheffer, Director of Environmental Health Projects at St. Johns Well Child and Family Center, inspector training fails to provide inspectors with adequate knowledge to target underlying causes of health problems within housing units.^{84 85} When inspectors lack the ability and knowledge to recognize the connection

⁷⁷ Chick, Laura. 2007. *Follow-Up Audit of the Housing Department's Systematic Code Enforcement Program (SCEP)*. Audit. City of Los Angeles Office of the Controller, July 16. http://controller.lacity.org/Audits_and_Reports/index.htm.

⁷⁸ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁷⁹ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

⁸⁰ Guzman, Cynthia (Master's Student at UCLA School of Public Policy). Interview. Feb 27 2012

⁸¹ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁸² Guzman, Cynthia (Master's Student at UCLA School of Public Policy). Interview. Feb 27 2012

⁸³ Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

⁸⁴ Ibid.

between leaky pipes, mold, and asthma or structural issues such as broken floorboards with cockroach infestations and indoor allergies, citations and Orders to Comply may not, and do not, effectively address the causes of tenant health problems. Without this type of training, inspectors have been known to ascribe to the common belief that tenants are somehow to blame for their conditions.⁸⁶ For example, classist and racist stereotypes have historically blamed low-income individuals for the presence of pests as a result of unhygienic tendencies, just as prior to the publication of *How the Other Half Lives* those in poverty were blamed for their circumstances.

Beyond code enforcement, organizers and advocates noted that inspectors from both the Department of Building and Safety and Los Angeles Housing Department SCEP have no mandatory training regarding the rent stabilization ordinances (RSO), the realities of landlord-tenant relations due to RSO, or relocation assistance.^{87 88 89} A lack of understanding of the complicated relationship between low-income tenants and their landlords, a lack of knowledge regarding the state of affordable housing, and a lack of understanding of tenant rights has directly lead to situations in which inspectors have made suggestions to low-income families that are not grounded in the reality of the situations of the tenants. For example, inspectors have suggested tenants should move to solve habitability problems without acknowledging the financial constraints of low-

⁸⁵ Farrell-Sheffer, Anne. (Director of Environmental Health Projects, St. John's Well Child and Family Center) Interview. Mar 2 2012.

⁸⁶ Bustillo, Roberto. (Organizer, L.A. Voice) Interview. Apr 10 2012

⁸⁷ Abood, Maya (Organizer/Grassroots Media Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁸⁸ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁸⁹ Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

income tenants or the lack of affordable housing.⁹⁰ ⁹¹ By making ill informed comments such as these, tenants feel shameful disrespected and frustrated towards the city officials who should, instead, be their allies. Further damaging the relationship between inspectors and tenants, inspectors from the Department of Building and Safety have been known to prioritize the issuance of building permits over tenant health. As an agency whose primary objective relates to construction, inspectors do not have formal training to best support tenants. It has been reported that during inspections of units some Department of Building and Safety inspectors have spent little to no time talking about habitability issues with tenants and instead chose to spend the most time catering to and interacting with management.⁹²

INSPECTION PROTOCOL

Inspector training is not the only barrier preventing the end of Los Angeles' slum housing problem. Although the existence of unaddressed unsafe units can partially be attributed to a lack of holistic training, issues in relation to inspection problems do not end with training. When SCEP was first initiated, rental units with two or more units were to be inspected for habitability violations on a three-year cycle, those identified as having moderate habitability violations were to be inspected every two years, and the more dangerous and concerning units were to be inspected annually.⁹³ Due to budget cuts

⁹⁰ Abood, Maya (Organizer/Grassroots Media Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁹¹ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁹² Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

⁹³ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

and a lack of adequate staffing, units are more often inspected every four or five years.⁹⁴

This low inspection rate results in tenants throughout the city living in substandard conditions detrimental to their health for years on end.

Regarding the notification of inspections, landlords are given the upper hand. Thirty days prior to inspections being conducted the landlord is informed of the upcoming inspection, whereas tenants are made aware of the inspection date and time seven days prior to the inspection.⁹⁵ Whereas landlords may have a month to prepare for the inspection and fix code violations to avoid LAHD interference, tenants are left at a disadvantage in preparing for the inspection and are only given notification seven days prior to the inspection. If tenants are unable to be home during the inspection, then inspectors will have no opportunity to speak with tenants regarding conditions.⁹⁶ Paired with the fact that some dangerous conditions can be difficult to spot upon a quick glance, having a tenant or tenant advocate present during the inspection can increase the quality and intensity of the inspection. By not mandating tenant interviews, inspections are devoid of the input of the individuals who have the most to lose.

Language barriers can also compromise inspection quality. Although the Los Angeles Housing Department is a city entity providing a city service, inspectors are not required to be bi-lingual or mono-lingual.⁹⁷ Oftentimes English speaking inspectors will inspect units of mono-lingual Korean or mono-lingual-Spanish speakers and be unable to communicate with the tenant regarding health concerns or code violations that an inspector would not be able to see on their own. Non-profit employees are known to step

⁹⁴ Ibid.

⁹⁵ Los Angeles Housing Department CEU - Programs.

<http://lahd.lacity.org/lahdinternet/CodeEnforcement/Programs/tabid/390/language/en-US/Default.aspx>.

⁹⁶ Guzman, Cynthia (Master's Student at UCLA School of Public Policy). Interview. Feb 27 2012

⁹⁷ Ibid.

in to help with the translation during the inspection process, but due to the fact that it is not required or mandated, inspections often occur without inspector-tenant communication.

ENFORCEMENT ISSUES

Organizers and advocates note that these agencies have been unable to completely hold landlords accountable or dismantle slum housing across the city and continue to demand more resources for enforcement. Most subjects interviewed cited problems of enforcement as a key factor in this. Enforcement issues are results of a lack of a standardized repair procedure and a lack of strong landlord sanctions. The lack of strong enforcement mechanisms directly contribute to the state of rental housing in Los Angeles city. The strength of enforcement is intimately tied to the lack of coordination between the agencies involved in the slum housing issue.

For one, code enforcement is compromised due to the fact that there exists no standard of repairs. SAJE organizers reported that a lack of regulated and specifically articulated repair regulations has created a venue for landlords to conduct less-than-safe repairs.^{98 99 100 101 102} Without a strongly regulated repair protocol, landlord's can use less-than-adequate measures to bring units up to code. Within the housing sector, these

⁹⁸ Abood, Maya (Organizer/Grassroots Media Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

⁹⁹ Barrera, Jose (Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012.

¹⁰⁰ Gonzalez, Favian. (Organizing Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

¹⁰¹ Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

¹⁰² Serrano, Gloria (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

are termed as “mickey mouse” repairs.¹⁰³ Maya Abood, a SAJE organizer, provided the quintessential example of one such “mickey mouse” repair. A landlord given a Notice to Comply for a leaking pipe repaired the pipe problem, but did nothing to replace the carpet below it. Due to the leaking pipe, the carpet grew large amounts of mold. In overcrowded units, such as are many of these low-income units, children often sleep on the floor and are highly susceptible to indoor allergens found in mold.¹⁰⁴ Larry Gross used the example of landlords painting over mold and mildew on walls, rather than repairing the underlying cause of leaky pipes within the walls themselves to corroborate Maya Abood’s claim that these “mickey mouse” repairs are rampant.¹⁰⁵ Repairs such as these violate a tenant’s right to safe housing as they allow a unit to pass an inspection process created to end unsafe habitability conditions.

“Mickey mouse” repairs are not unrelated from the interagency issues discussed prior. Due to the fact that a unit moves between agencies, ensuring quality repairs is not easy. A unit might move from being under the jurisdiction of LAHD to that of the Department of Building and Safety during the repair and construction process and then back to LAHD, regardless of the fact that the Department of Building and Safety is known as being less tenant-focused.

These less than ideal repairs are also perpetuated by the lack of understanding or training regarding the connection between health and housing. The Department of Public Health, for example, has ordered landlords to address pest and vermin infestations, but

¹⁰³ Farrell-Sheffer, Anne. (Director of Environmental Health Projects, St. John’s Well Child and Family Center) Interview. Mar 2 2012.

¹⁰⁴ Abood, Maya (Organizer/Grassroots Media Coordinator, Strategic Actions for a Just Economy) Interview. Feb 28 2012

¹⁰⁵ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

has done so with no specification regarding *how* to go about doing this. The Department of Public Health's primary role is to work with restaurants and public spaces to protect public safety. This entity does not specialize in housing issues and tends to focus more on the effects of businesses, like restaurants, on public health and therefore is not knowledgeable about indoor pollutants or their effects on health. Due to this oversight, landlords are known to use highly toxic bug bombs or pesticides that may be effective at killing off an infestation, but may also be damaging to the neurological development of children within the same unit. Rashes and breathing problems have also been reported in the days following an increased use of fumigants.¹⁰⁶ A lack of training regarding this has created a system where the city mandates actions that actually harm LA residents.

Enforcement is also compromised due a lack of strong landlord sanctions. Fines, for example reach no more than \$1,000. This may be less than the cost to bring a unit up to code so it creates an alternative path to compliance that some landlords deem cost-effective.

Policy directors, advocates, and organizers all agreed that rental housing should be held to the same level of accountability as other businesses, such as restaurants. Greg Spiegel described to me a situation in which landlord Monica Hujazi's property had 2,700 code violations in a 50 unit property, but was able to maintain insurance as well as the ability to continue providing landlord services despite massive code violations. If a restaurant owner chronically allows unsafe health risks, the restaurant will at some point be closed down by the Department of Health, but when a landlord continuously does not provide tenants with a safe and healthy home environment, LAHD and the Department of

¹⁰⁶ Lowe, Albert, Gilda Haas, and eds. 2007. *Shame of the City: Slum Housing and the Critical Threat to the Health of L.A. Children and Families*. Los Angeles: Strategic Actions for a Just Economy, April.

Building and Safety issue small fines, cite order to comply notifications. If tenants or advocates put pressure onto LAHD, they can possibly place the property into the Rent Escrow Account Program, but there is no quick way to take the landlord out of the business. The City Attorney may press charges if a landlord acts egregiously, but there is no guarantee that these actions will be taken without outside sources, such as community organizations, pressure the City Attorney to do so.

When asked for examples of slum housing enforcement problems, interviewees from SAJE, CES, LA Voice, and Inner City Law Center all brought up Frank McHugh. McHugh was once one of the largest private landowners in Los Angeles City and was known as one of the most notorious slumlords. Thousands of tenants resided in his buildings and all across the city these residents lived in slum conditions that endangered their health. They dealt with pest infestations, faulty electrical wiring, and other housing conditions qualifying as “severe physical problems”. McHugh was a large-scale slumlord, who profited off of taking advantage of low-income immigrant families. Negligence to maintain his buildings up to code led to severe structural issues. The severity of these complexes separated him from the typical landlord, who may be negligent due to being strapped for cash or lacking knowledge regarding the relationship between health and housing, to the status of full-blown slumlord. In December of 2000 one of McHugh’s multi-unit apartment complexes collapsed in Echo Park due to severe structural damage that had not been addressed. This collapse resulted in a hundred tenants becoming homeless and left Juan Pineda dead and his children fatherless.

Although this Echo Park complex was the only property to collapse, McHugh’s properties typically had upwards of 100 code violations per property. Due to the

egregious and visible nature of his indiscretions, the City Attorney, with pressure and support from community-based organizations, forbade McHugh from managing residential properties, ordered assessments of all other units owned by him, ordered him to create a trust account for rehabilitation of properties, and ordered him to hire a city-approved management company.¹⁰⁷ ¹⁰⁸ Although this resolution represents a win for tenant advocates in the city, the fact that landlords like Hujazi and McHugh continued to run their unsafe businesses for so long speaks magnitudes of the lack of strict and effective slum housing enforcement in Los Angeles. These landlords and their business practices, that violate the rights of tenants to a safe and livable home, highlights the lack of strong consequences to deter large-scale slumlord behavior as they lack intense fines or jail time, unless tenant advocates fight for justice. The story of these large-scale slumlords, highlights the need for an enforcement strategy that does not treat small landlords the same as large-scale and wealthy slumlords.¹⁰⁹

Interviewees also unanimously agreed that REAP is not the end-all enforcement mechanism within Los Angeles. For one procedural time to enter REAP is lengthy and it puts the health of the tenant second to securing due process for landlords. Once in REAP, this does not mean tenants health rights are secured. Although REAP property turnover rate has increased in the last few years, some properties fall through the cracks and remain in REAP indefinitely. According to an internal SAJE memorandum from December 2011, 35% of the active REAP cases were opened before or during 2008, with

¹⁰⁷ SAJE. 2010. *Slumlord Who's Building Collapsed with Tenants Inside Sentenced in Criminal Charges for Slum Conditions.* (April). News Release.

¹⁰⁸ Organizers at SAJE and LA Voice mentioned that McHugh circumvented these orders by transferring his properties to like-minded associates who continued to run these properties as slum properties rendering the City Attorney's decree useless.

¹⁰⁹ Bustillo, Roberto. (Organizer, L.A. Voice) Interview. Apr 10 2012

the oldest case being opened in 1996. Translated into the real world, these statistics have grave consequences. For tenants in these units, they have been living in substandard and unsafe conditions for upwards of 16 years. These facts substantiate the argument that although progressive, the current Los Angeles slum housing enforcement policies are still unable to fully protect tenants to the degree necessary to protect their rights to fair and safe housing.

MONEY MATTERS: Funding and Budgets

In my research it was easier to learn details regarding program structure, interagency collaboration, and other aspects of policies to analyze, but the questions of funding continuously served as a complicated backdrop issue in slum housing enforcement.

Interviewees, across the board, cited a lack of funding as an obstacle to effectively protecting the health of Los Angeles tenants. In fact, the 2007 city audit of SCEP found that the failure of SCEP to inspect all units within the designated 3-year cycle was due to a lack of adequate funding.¹¹⁰ Funding issues are extremely complicated and wrapped up in bureaucracy and in my research this lack of funding for SCEP and REAP was attributed to several factors. For one, interviewees believed the current political environment does not prioritize tenant rights. Larry Gross points out City Council as a major cause of lack of funding. In charge of city budgets, City Council has potential to

¹¹⁰ Chick, Laura. 2007. *Follow-Up Audit of the Housing Department's Systematic Code Enforcement Program (SCEP)*. Audit. City of Los Angeles Office of the Controller, July 16. http://controller.lacity.org/Audits_and_Reports/index.htm.

support slum housing enforcement programs, but City Council has not done all that it can to ensure these programs are fully funded.¹¹¹

The relationship between City Council and slum housing is complicated. Due to actions taken by City Council, funding for LAHD programs have increased in the past few years, but this increase in funding was paired with an extremely insensitive measure. In the fall of 2011, the Los Angeles Housing Department requested a 22% increase in the annual SCEP fee charged to each unit increasing it from \$35.52 to \$43.32. Increasing this fee was avidly supported by non-profits and tenant's rights groups in order to maintain LAHD programs and efforts, but where the extra funding would come from was up for debate. City Council, in a vote of 8 to 5, struck down tenants' rights groups' suggestion that this new fee be evenly split by both landlords and tenants and instead allowed for a 100% push-through of the fee onto tenants.¹¹² This vote exemplifies City Council's lack of focus on tenant protection. In learning about this fee ordeal, I returned to the Blue Ribbon Committee's original report in search of SCEP's its original purpose. , This report called for funds for programs to be "generated by those activities, with minimal reliance on the general fund and with costs allocated most heavily to those who violate the law."¹¹³ This edict implies that tenants should not have to pay for their right to safe housing, but that protection should be built into the structure itself. In the past 14 years, the program has strayed from its original purpose and costs now most heavily rely, not on

¹¹¹ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

¹¹² Coalition for Economic Survival. Los Angeles City Council Denies Equity and Justice to Tenants «Organizing Times. <http://blog.cesinaction.org/2011/10/26/los-angeles-city-council-denies-equity-and-justice-to-tenants/>.

¹¹³ Adams, Mark, Gary Blasi, and et al. 1997. *The Slum Housing Problem In Los Angeles and The Department of Building and Safety- Interim Report Number 1 of the Blue Ribbon Citizens' Committee on Slum Housing.* (27). July 28.

those who violate the law, but those whose health is at risk leaving them with the having to pay to protect their rights.

Fee collection was also cited a source of trouble in regards to funding. The 2007 audit found that SCEP fees were occasionally misplaced within LAHD and were not used to fund SCEP. Cynthia Guzman pointed out that without a more recent audit, there is no clear public knowledge regarding whether or not LAHD has rectified this accountability programs. Furthermore, LAHD has no official in house collection agency. Without a single entity in charge of collections, tenants are paying this extra cost, but this allotted amount are ending up in landlord pockets, not in LAHD.¹¹⁴

AFFORDABLE HOUSING

Each individual I interviewed emphasized the importance of the connection between slum housing and affordable housing. Anne Farrell-Sheffer, Greg Spiegel and the organizers at SAJE each emphasized the necessity and the current disconnect in Los Angeles of affordable housing understood as an underlying cause of the slum housing problem. In Los Angeles, this lack of affordable housing directly leads to the proliferation of these egregious slum housing conditions. When asked about affordable housing in the context of Los Angeles city I got back two types of responses. The first focused in on Los Angeles' Rent Stabilization Ordinance, while the other focused on more general comments regarding affordable housing.

As RSO helps keep rental prices for properties with two or more units on them that are built before 1978 from jumping up to their fair market value, it preserves a stock

¹¹⁴ Guzman, Cynthia (Master's Student at UCLA School of Public Policy). Interview. Feb 27 2012

of below market value housing. It, along with other policies, have made Los Angeles a city with one of the largest affordable housing stocks totaling upwards of 1 million units.¹¹⁵ Although impressive, this quantity is far from meeting the demonstrated need of affordable housing in the city. Anne Farrell-Sheffer pointed out that, regardless of its imperfections, the RSO system is better than nothing and that compared to tenants who live outside of the city limits, tenants under RSO are much more protected. RSO tenants can do things such as complain to their landlords or request repairs through a city office without the threat of the landlord retaliating by increasing rent or threatening with evictions.

Regardless of these successes, several individuals I interviewed pointed out where RSO fails to fully protect tenants. According to Greg Spiegel, there currently exists no mechanism in place to regulate and monitor rent increases. When a unit is under RSO and due for rent increases, LAHD sends out notifications to tenants and landlords stating the amount of the increase. These notices are only partially beneficial as they do not state what the new total rent should be. If a unit has experienced an illegal increase in rent, tenants are left unawares and are only given enough information to *assume* the rent they were already paying was the legally determined amount. Not only are tenants left with the option of assuming where their rent should be, LAHD does not actively track rents throughout the city. An economic roundtable study found that 27% of Los Angeles tenants received an illegal rent increase without their knowledge.¹¹⁶ Tenants are not the only ones left in the dark regarding rent increases. There currently exists no rent registration or any system to catalogue or store rent receipts and costs. This creates a

¹¹⁵ Bustillo, Roberto. (Organizer, L.A. Voice) Interview. Apr 10 2012

¹¹⁶ Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

system in which Los Angeles has the policies in place to protect tenants paired with lax enforcement tools and results in less than adequate tenant protections.

The Rent Stabilization Ordinance is limited due to broader issues as well. Due to the fact that vacancy control is illegal in California RSO cannot guarantee the long-term existence of affordable housing. Greg Spiegel lamented the passage of the Costa Hawkins Act, as a limiting factor to ensuring an affordable housing stock large enough to meet the needs of the Los Angeles tenants. Under the current RSO system, once a tenant moves out of a unit, the rental price may rise to their fair market value. The new rent is set at the baseline of the current FMR with rental increases again controlled by RSO regulations successfully preventing an accelerated market-rate increase of rent, while not guaranteeing long-term affordability.

Los Angeles, and the state of California at large, currently lacks the funds necessary to increase the amount of affordable housing.¹¹⁷ ¹¹⁸ Without an increase in funding, affordable housing initiatives cannot be undertaken. According to Roberto Bustillo, a lack of funds prevents the Affordable Housing Trust Fund from being successful to the point of solving the affordability crisis. In 2000, Los Angeles instituted the Affordable Housing Trust Fund to “create affordable rental housing for low and very low income households by making long-term loans for new construction or for the rehabilitation of existing residential structures.”¹¹⁹ The Affordable Housing Trust Fund is funded through a mixture of federal, state, and city level subsidies, grants, and various programs. Roberto Bustillo was quick to point out that the economic crisis and

¹¹⁷ Ibid.

¹¹⁸ Ibid.

¹¹⁹ Los Angeles Housing Department. Background: Affordable Housing Trust Fund. *Los Angeles Housing Department*. <http://lahd.lacity.org/lahdinternet/AffordableHousingTrustFund/tabcid/126/language/en-US/Default.aspx>.

government debt has made the Affordable Housing Trust Fund less able to fulfill its goal of affordable housing for all. The pitfalls of the current RSO program and Affordable Housing Trust Fund creates avenues through which the human rights of tenants remain unfulfilled.

ELECTED OFFICIALS AND PUBLIC AWARENESS

The political landscape plays a large role in determining the strength of slum housing enforcement policies. Interviewees pointed to the City Attorney and City Council as active players who have the potential to reshape enforcement policies to better protect tenants.

According to the official website of the City Attorney, the City Attorney's office, is in charge of "improving the quality of life and public safety in the City through the prosecution of criminal misdemeanors and implementation of innovative crime prevention measures."¹²⁰ With this charge, the City Attorney, becomes the prime player in the position of prosecuting slum lords. My research has shown that the City Attorney, an elected official, is not aggressive in response to slum housing issues as non-profits think they could be.¹²¹ ¹²² Slum housing cases are supposed to be brought to courts on the behalf of tenants, but in reality these cases are few and far between and there exists little priority or systematic approach to address the issue on a large scale.¹²³ Without the City

¹²⁰ Los Angeles Housing Department. City of Los Angeles:: Office of the City Attorney. http://atty.lacity.org/OUR_OFFICE/Mission/index.htm.

¹²¹ Guzman, Cynthia (Master's Student at UCLA School of Public Policy). Interview. Feb 27 2012

¹²² Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

¹²³ Ibid.

Attorney's office prioritizing these cases, expedient legal action is not taken to protect tenants throughout the city.

The City Council also plays an important role in slum housing enforcement policies. As discussed earlier, the City Council can control LAHD finances in several ways. Not only does the City Council have power to allot funding, but it also can dictate where funds come from. Last fall, City Council voted in favor of landlords and thus placed the burden of the increase of SCEP fees to that of tenants, emphasizing, yet again, which side of the tenant-landlord battle City Council supports. When asked, "What will it take to improve the current slum housing enforcement programs?", Larry Gross, the Executive Director and co-founder of Coalition for Economic Survival who has been fighting for tenants' rights in Los Angeles for over thirty years, responded, "It's currently a bleak picture with City Council."¹²⁴ Repeatedly, the current City Council has voted down pro-tenant initiatives and according to Larry Gross, a change in political makeup is necessary for real changes to occur.

It's important to note that the City Council and City Attorney are not the end all be all of power when it comes to creating a more just housing landscape. These elected officials gain their power through elections. When taking a step back, the power to change the current climate lies with the public. This power comes in two forms- direct elections of pro-tenant candidates and immense public pressure upon those already in office. Anne Schaffer, Greg Spiegel, and Larry Gross each discussed the role of activism as integral in reshaping current policies to better support the health and human rights of Los Angeles tenants. Larry Gross focused on public support and political momentum as

¹²⁴ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

the only way to ensure the protection of tenants. For this to be successful slum housing must be prioritized as an important issue in the upcoming elections.¹²⁵

Along with Larry Gross, Anne Schaffer and Greg Spiegel also envision public support as key tactic in creating political change, regardless of election timing. The resurgence of public support, in and of itself, may be enough to reshape the current slum housing landscape. Key to this public initiative, must be a call to create policies of those in power, an unending push for changes, and a general public consensus regarding the importance of these issues.¹²⁶ To increase public knowledge regarding the realities of slum housing conditions and thus increase public support for issues, Greg Spiegel suggested a second Blue Ribbon Citizen's Committee be reinstated.¹²⁷ According to Bill Pitkin, a former researcher in the Advanced Policy Institute at UCLA, the first Blue Ribbon Citizen's Committee capitalized on the 1992 Los Angeles civil unrest, the 1994 earthquake, and the recent real estate depression and economic recession in order to be successful.¹²⁸ Given the recent foreclosure crisis, it seems that Greg Spiegel's suggestion has perfect timing.

ROLE OF NON-PROFITS

The role that non-profits play in promoting a tenant friendly environment cannot be underestimated. Non-profits involvement is attributed to the fact that Los Angeles Housing Department has contracted both tenant and landlord outreach work with several

¹²⁵ Ibid.

¹²⁶ Farrell-Sheffer, Anne. (Director of Environmental Health Projects, St. John's Well Child and Family Center) Interview. Mar 2 2012.

¹²⁷ Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

¹²⁸ Pitkin, Bill. 2002. Did I say slums? Housing Reform in the City of Los Angeles presented at the Association of Collegiate Schools of Planning (ACSP) Conference, November 23, Baltimore, Maryland.

non-profits throughout the city. The following organizations hold contracts with LAHD: Coalition for Economic Survival, Inner City Law Center, Inquilinos Unidos, the Los Angeles Center for Law and Justice, and the Eberly Company. The first four contract holders are tenant-focused and provide outreach informing individuals of the REAP process and encouraging tenants to participate in it.

According to Larry Gross, originally the city *only* contracted out to organizations for tenant outreach, but in response to pressure from landlord's rights groups, the city instituted a landlord outreach program in order to assist landlords with outreach services so as to expedite compliance and increase the rate of turnover with REAP properties.¹²⁹ In order to create this new landlord oriented contract, the City cut funding to the other contracts. For Coalition for Economic Survival this meant a decrease in funding while the same workload remained.¹³⁰ Although this negatively affected the effectiveness of these tenant-focused contracts, Larry Gross was pleased to explain the surprising positive side effects of this new contract.

Since the inception of the landlord focused contract, Gross has witnessed a decrease in the average time properties remain in REAP and an increase in the frequency of properties moving outside of REAP.¹³¹ Gross also mentioned that when Coalition for Economic Survival is finding tenant outreach inadequate in and of itself of improving housing conditions, CES can call upon the Eberly Company to appeal to landlords, assist to their needs, and thus help increase the rate of compliance and help improve the living conditions of tenants with less delay.

¹²⁹ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

¹³⁰ Ibid.

¹³¹ Ibid.

When asked about the role of non-profits in relation to slum housing issues I found differing expectations dependant upon whom I was asking. Organizers at SAJE Maya Abood, Jose Barrera, Favian Gonzalez, Andres Ramirez, and Gloria Serrano cited that non-profits such as theirs were “picking up the city’s slack.”¹³² This claim was founded upon the ideal that ensuring the rights of tenants throughout the city *should* be under the jurisdiction of the city, and that non-profit participation, ideally, would be rendered useless where the city is adequately living up to its responsibility to protect and support individuals residing within city limits. Larry Gross, on the other hand, responded to the same question with a very different approach. Gross focused on the necessity of non-profits as something that is indispensable and ideal. Within this system, it is necessary for outside non-profits to provide advocacy and support for tenants. He envisions the type of support that tenants can receive from non-profits as being unmatched from any government entity, even an ideal one.¹³³ This difference in opinion uncovers the complexity of the relationship between non-profits, the city, and tenants.

FORECLOSURES: THE CRISES AND THE AFTERMATH

When I initially began my research I intended to learn about the horrors of huge slumlords and while I did learn about several sneaky tactics, I was shocked to discover a more menacing aspect regarding slum housing issues in Los Angeles: banks as landlords. Although I hypothesized that the foreclosure crisis of 2008 had contributed to slum housing, I never expected the role of banks to be so prominent in the issue. In light of the foreclosure crisis, rental units throughout the city were foreclosed on and placed under

¹³² Ramirez, Andres. (Tenant Organizer, Strategic Actions for a Just Economy) Interview. Feb 28 2012

¹³³ Gross, Larry. (Executive Director, Coalition for Economic Survival) Interview. Feb 13 2012

the ownership of banks, entities not traditionally qualified to provide quality rental conditions for tenants.

In September of 2011, SAJE researchers analyzed the list of properties remaining in REAP and found that as September 22nd 1,632 units were within the Rent Escrow Account Program and of these, 170 were owned by banks or foreclosure-service firms.¹³⁴ These firms and banks were property holders of more REAP units than any other individual or team. Whereas REAP, can be used to cut off a landlord's income in order to promote code enforcement, Banks and foreclosure-firms are not reliant on rental income and therefore do not feel the same crunch due to a cut off in rent collection. As of now, no concerted efforts are being made by LAHD to address these non-traditional landlords. A lack of a concerted effort directly effects the livelihood and health of tenants living under these conditions.

Stemming from the foreclosure crisis is the issue of tenant notification regarding foreclosures. As a landlord's property is being foreclosed on, there currently exists no mechanism for notifying tenants of their situation. Foreclosure occurs when an owner defaults on their mortgage payments. If a landlord is unable to keep up their mortgage payments, they often begin to cut corners, such as maintenance, and end up putting the tenants health at risk. Tenants may notice an increase of landlord negligence, but may have no idea how this is connected the financing of the unit they reside in. Greg Spiegel noted that there is currently no focused effort to target properties at-risk of foreclosure.¹³⁵ When these properties approach foreclosure, an increase of habitability problems arises,

¹³⁴ Hermosillo, Jesus, and Soham Patel. SAJE. 2011. Preliminary analysis of active REAP cases list. December 6.

¹³⁵ Spiegel, Greg. (Director of Public Policy and Communications, Inner City Law Center). Interview. Feb 22 2012

and an intervention by LAHD, possibly focused on increasing code enforcement or helping with foreclosure litigation, could be beneficial at protecting the rights of health and fair housing for these tenants.

Recommendations and Conclusions

The in depth analysis of the current policies and programs in Los Angeles from the point of view of tenant advocates and organizers exposes the need for immediate reform in order to best protect the rights of Los Angeles tenants. The individuals interviewed not only work closely with the system, but from day to day interact with the tenants who live in these conditions- the interviewees have a unique perspective and personal connection to the issues making their insights highly valuable. Although the city of Los Angeles has innovative and proactive programs, currently the human rights of low-income tenants are not prioritized and exist in an environment where landlords continuously profit off of the pain of low-income tenants and where human rights violations are rampant. The following set of recommendations is suggested so Los Angeles can better protect residents and their rights to safe housing.

First and foremost, I recommend a shift regarding the current ideology surrounding slum housing. Los Angeles must recognize housing as a human right and put the health of tenants above all other rights. A commitment to this stance necessarily leads to the following changes; landlords are understood as service providers and therefore face consequences that quickly and effectively encourage code compliance, bureaucracy debacles cannot be allowed to remain as obstacles in ensuring tenant protections, Los Angeles Housing Department must adjust its Systematic Code Enforcement Program and Rent Escrow Account Program to close untimely loopholes, and actions must be taken to address affordable housing, the underlying issue that causes slum housing as well as encourage public awareness and the creation of a political landscape necessary for reform. Specific explanations of these changes are found in the following pages.

Landlords as Service Providers

The city must ensure that those who provide tenants with housing must meet safety and health standards to protect and support these tenants. If actions that violate the health and safety of tenants are understood as egregious and unacceptable, then they must be met with a systematic and aggressive response. The City Attorney's office, through public pressure, must enact systemic and hefty monetary fines that increase with the severity of the code violations and result with consequences that more readily match the crime. Jail time and orders to revoke property must be put on the table. The prosecution of landlords such as McHugh must not represent victories, but they must become the norm. It should be the slum conditions themselves that stand out as unusual. Tenant health must not continue to be jeopardized in order to promote landlord wealth or be skewed as an issue of personal property.

Moving Beyond the Bureaucracy

Establishing Los Angeles as a city focused on preserving these human rights of tenants to fair housing will create the need for immediate reform regarding the several agencies involved in slum housing issues. The current state of bureaucracy moves properties back and forth between agencies, but does not provide tenant protections to ensure that this moving between agencies will have improve housing conditions. In order to cut down on agencies involved the Los Angeles Housing Department, the most effective, technologically advanced, and methodical agency should expand its jurisdiction to include more properties and improve the range of tenants who can benefit from Los Angeles Housing Department involvement. Single-family units should immediately be

transferred to the Los Angeles Housing Department's jurisdiction. This move will increase the number of tenants protected while also expanding the funding base to make the expansion of Systematic Code Enforcement Program feasible.

In order for the city to effectively decrease interagency problems necessary for either the resurrection of the Slum Housing Taskforce or an Interagency Forum to be created. Such a forum or taskforce will provide a space for officials from different agencies to communicate with one another and to solve these jurisdiction overlaps and gaps. This forum must immediately establish and prioritize short-term and long-term goals to best reshape policies and programs to epitomize the focus on tenant protections. Short-term goals that need immediate addressing are as follows; ensuring tenant protections do not go unprotected due to gaps in jurisdiction and protection, standardizing definitions of code violations and specifying and regulating repair requirements, establishing a protocol for interagency communication, and improve and standardize inspector training across departments to ensure that regardless of the agency involved inspections will result in similar assessments. Actions must immediately be resolved in order to improve tenant support.

1) Jurisdiction Gaps

Illegal units, California State Code 17920.3.12, and the foreclosure crisis must all be addressed immediately. A focus on housing rights grants tenants residing in illegal units deserving of protection regardless of the legality of their unit. This change in focus will require agencies to create a protocol to encourage landlord compliance, regardless of the legality of the unit in order to expand tenant rights protections across the city.

This taskforce or forum must also plan initiatives to amend California State Code 17920.3.12 and expand the specificity of the term “health officer” giving non-Department of Public Health officials power to deem a unit substandard due to the presence of vermin and other pests. Expanding who can deem a unit as substandard will inevitably cut down the need for involvement of the Department of Public Health, an agency whose primary focus is not housing issues, lessen the bureaucratic tangle tenants must navigate to trigger landlord compliance all while decreasing the number of agencies involved in improving living conditions. For the Los Angeles Housing Department, amending California State Code 1792.2.12 will allow Notice and Order to Comply’s to address and mitigate the health consequences of infestations.

Finally, the issue of the foreclosure crisis and banks and slumlords must be addressed. As of now, the current REAP system does not differentiate between single landlords and banks as landlords, resulting in a REAP system that does not incentivize repairs by banks. Due to the fact that banks are not reliant upon properties for income and have seized the property in reaction to landlord’s defaulting on mortgages, the Rent Escrow Account Program’s method of cutting off the cash flow from rent becomes useless. The Rent Escrow Account Program must either be reworked with subset of regulations focused and tailored specifically to when banks serve as slumlords or a new program must be created outside of the current Rent Escrow Account Program that appeals to banks, encourages code compliance, and fully protects tenants living in foreclosed properties.

2) Standardize Repairs

Using the results from the interagency taskforce or forum, a standardized repair process must be established that addresses the intricate connection between housing conditions and health effects. “Mickey Mouse” repairs that do not address the underlying conditions that endanger the health of tenants, can no longer be tolerated as an adequate form of code compliance. Greg Spiegel, from the Inner City Law Center, suggests a contractor certification process be put in place to end the proliferation of these less-than-safe repairs. By requiring a contractor to certify that repairs were made using up-to-code materials and that such repairs should last for a given amount of time creates a repair process with a chain of liability built into it as a method to encourage compliance. This chain of liability will apply personal pressure on contractors and discourage them from conducting “mickey mouse repairs” that make them potentially liable if the repair cannot hold up for the given period of time determined required of it. Within this context, a contractor who certifies “mickey mouse repairs” falsely, or a landlord who intentionally does not hire and a contractor who can certify repairs according to the standards will be placing themselves at risk for future litigation. This threat of liability will help hold landlords and contractors accountable for maintaining units that meet the health and safety needs of tenants and discontinue the occurrence of “mickey mouse repairs”.

3) Improve Inspections: Trainings and Protocol

Regarding inspector training and development, agencies across the board must work together to renovate current training programs and create in-depth trainings that provide inspectors with a broader knowledge set. These newer trainings must be holistic and move beyond the current training agenda. They must emphasize general health consequences stemming from of housing conditions, explain the role of Los Angeles’s

Rent Stabilization Ordinance and how it functions, and inform inspectors of the reality of under which low-income tenants live to help dissolve any anti-tenant sentiments inspectors may have. Inspectors must be informed of how the affordable housing crisis as well as the lack of stringent enforcement policies contributes to the existence of slum housing. Knowledge regarding the underlying causes of slum housing will place emphasis on debunking the myth that tenants are somehow to be blamed for housing conditions and will help facilitate inspector support that is more in tune with tenant needs. By including the necessary knowledge to understand the complexity of rental policies and politics in a training program, agencies can create teams of inspectors that can understand their own role in a broader context, making them more effective as inspectors.

This new training program must be created with the help of the Interagency Taskforce or the Interagency Forum, the public health community, as well as non-profits and community-based organizations that work Los Angeles tenants' rights issues. The involvement of these non-governmental organizations is imperative as it will help shape the new training program to be in touch with tenant needs and have the possibility of creating the change needed most. This revamped training program must not be limited to only newly employed inspectors. Through staff development days, current inspectors as well as new inspectors must be educated in this new and more expansive training. Inspection quality must be standardized at a high level to best protect all tenants.

To further increase inspection effectiveness, Los Angeles Housing Department must provide tenants with assurance that they will be able to communicate with inspectors regarding their concerns during the inspection of their unit. To do this, the time

between tenant notification and the Systematic Code Enforcement Program inspections must be increased in order to give tenants more than 5-7 days to rearrange their schedules or find a proxy to point out their concerns regarding housing conditions to the inspector during their appointed inspection time. Tenant input can help make inspections be grounded reality of what it is like to live in a unit and it gives the inspector the ability to understand more about the unit's conditions than they could discover on their own during a walkthrough.

In response to language barriers, effective inspections of low-income units must also include a mechanism for tenants to easily request a bilingual inspector or representative from a non-profit or community-based organization to serve as a translator and advocate. The Los Angeles Housing Department must strategically prioritize hiring new inspectors who possess bilingual skills to create a culturally appropriate and accessible Systematic Code Enforcement Program and must also find creative ways to ensure that a tenant is able to communicate their needs to an LAHD officer.

4) Increase Funding

Unfortunately, none of the proposed changes and improvements can be made without an increase in funding. The first step to solving the funding deficit requires that the Office of the City Controller to audit Los Angeles Housing Department's Systematic Code Enforcement Program as well as its Rent Escrow Account Program. The 2001 and 2007 audits of the Systematic Code Enforcement Program provide information regarding the effectiveness of Systematic Code Enforcement Program as well as an assessment of the management of funds associated with the program. Although accessible to the public and full of detail, these audits, conducted eleven and five years ago, no longer serve as an

up to date and contemporary resource regarding the current state of funding for these programs. They no longer highlight where the Los Angeles Housing Department is successful or not in reference to the Systematic Code Enforcement Program in 2012. Conducting an updated audit of this program as well as the Rent Escrow Account program will bring to light where these programs are ineffectively collecting, allocating, and utilizing funding.

The Los Angeles Housing Department must also focus on collecting fees systematically in order for the Systematic Code Enforcement Program to operate using its full budget potential. Due to the fact that funding comes primarily from the annual fees placed on every property under the Rent Stabilization Ordinance in Los Angeles, it is extremely important to hire a collection agency or create a division within the Systematic Code Enforcement Program to continuously collect unpaid fees. By ensuring that fees do not go uncollected by LAHD, LAHD will increase their current access to funding and support these programs' goals of efficiently supporting themselves.

Improvements specific to Los Angeles Housing Department

In order to best protect tenants the Los Angeles Housing Department must take immediate action to internal problems beyond the mentioned standardizing of repairs, improving inspections and inspector training, and prioritizing of tenant health over landlord wealth.

The Systematic Code Enforcement Program must be returned to its original and intended incarnation in which its funding source is congruent with the initial intentions of the program itself. The annual Systematic Code Enforcement Program fee must therefore

not continue to burden tenants. This annual fee must be split between landlords and tenants equally or must fall on landlords in order to be a program that best protects low-income tenants. By returning the concept of housing as a human right, paying for their protection of their right to livable housing reveals itself as a counter-productive measure that burdens those most in need of protection of ensuring it for themselves.

The Systematic Code Enforcement Program must also increase the frequency of inspections so as to ensure that all rental properties are surveyed within the intended four-year cycle. The program cannot continue to leave properties and units un-inspected for several years and leave the health and safety of tenants at risk for so long. To do so, Los Angeles Housing Department must increase the number of inspectors and the inspection rate.

The Rent Escrow Account Program must be re-evaluated and improved in order to best support tenants already within the program. The Rent Escrow Account Program is currently the strictest enforcement policy that is most enacted so it has potential to greatly increase code compliance to and to decrease slum housing. The Los Angeles Housing Department must take proactive action if a property remains in REAP for years. Waiting for landlord compliance is simply not enough when the health of tenants is put at risk. A period of time must be established as a cut off in REAP and once this period of time ends, stricter policies and sanctions must be put in place to ensure code compliance.

Landlord outreach, regarding the underlying problems of slum conditions, must also be implemented as a preventative measure to discourage landlord negligence. Properly informing landlords can facilitate a re-envisioning of a landlord's relationship to their tenants. Outreach targeted at landlords will focus on informing landlords of the

relationship health effects of housing conditions, as well as the most effective and safest way to fix said housing condition. The main goal of this type of outreach will be to promote a landlord's understanding of the role that their code compliance or non-compliance can have on a tenant's health and well-being. By informing landlords of the intimate connection between housing and health, something that is not common sense, outreach may have the bonus side effect of increasing landlord receptiveness to requests for timely repairs. This program has the potential to be successful for the same reasons the landlord outreach program within REAP has improved the turnover rate and subsequently protected more tenants in a timelier fashion. By appealing to landlords through supportive framework, attacking the problem of slum housing becomes one of attacking unfair and unjust conditions, rather than attacking individual landlords, putting them on the spot, and increasing tenant-landlord tensions.

Address Underlying Slum Housing Issues

Taking a step back from program structures, broader issues must be addressed in order to fully support Los Angeles tenants and end the human rights violations occurring in slum housing conditions. The most effective ways to protect the rights of tenants will be to attempt addressing the underlying affordability crisis that encourages slum conditions while simultaneously placing the issue of slum housing on the agenda of the general public. The best ways to do this will be through strengthening Los Angeles' Rent Stabilization Ordinance and taking a note from historical precedents to re-establish a contemporary Blue Ribbon Citizen's Committee on Slum Housing.

1) Recognizing the relationship between slum housing and a lack of affordable housing options in Los Angeles requires immediate action in order to increase the stock of affordable housing options. It is important to recognize that under the current financial state of the federal government and California state government funding the development and creation of new affordable housing options is limited if not impossible and until funds for affordable housing increase, Los Angeles cannot rely on these resources for improving housing options.

Turning over Costa Hawkins and legalizing rent control could also increase rental affordability rates throughout the state of California, but with the current political state in which the rights of landlords are seen as equal to and in opposition of tenant rights makes this option nearly unlikely, if not impossible.

This leaves the Rent Stabilization Ordinance as an ideal way to support affordability. As of now, the Los Angeles Rent Stabilization Ordinance exists differently in theory than in reality. Although legalized it is not fully enforced. By first addressing these gaps, the City of Los Angeles can use tools already in place to increase more affordable options. Ending rental increases, illegal under RSO, must be prioritized. In order to do this, the city must improve enforcement through the creation a system that tracks rent increases for all properties under RSO. The city could require rent receipts to be submitted to a database or be available upon demand of city officials or tenant advocates. Tracking rental increases will directly lead to improving notifications regarding rental increases. As of now, these notifications specify the legal amount that the rent can be increased, but it does not include a beginning rent or the new official rent as determined by the RSO. Creating this database will help track and identify illegal

rental increases, give non-profits and community organizations a database through which they can identify tenants in need of support, and will help empower tenants by informing them of their deserved rent under RSO.

Although less feasible than simply creating mechanisms to enforce regulations already in place, the city of Los Angeles should attempt to expand the Rent Stabilization Ordinance to cover more than just multi-unit rental buildings constructed before 1978. By expanding RSO to cover single-family rentals or moving up the cut off year the city Los Angeles could successfully expand the number of tenants who could rely on regulated rental increases and a more supportive tenant environment.

2) The Blue Ribbon Citizen's Committee of the 90's revolutionized popular rhetoric surrounding slum housing and led the creation of one of the nation's most innovative slum housing enforcement programs. The time is now to recreate this experience. The original Blue Ribbon Citizen's Committee placed the issue of slum housing on the general agenda through bringing the factual evidence of where city policies and programs failed to protect low-income tenants from unfair and unsafe housing conditions and resulted in the creation of a public buzz that forced swift action on behalf of the city government.

Fifteen years after this first success, the city of Los Angeles is ready for and requires a second incarnation the Blue Ribbon Citizen's Committee on Slum Housing to investigate the current state of slum housing. This reincarnation will not be exactly like its precedent as this updated version will have to explore new issues such as the role of banks as slumlords due to foreclosures as well as investigating and analyzing the

Systematic Code Enforcement Program, which did not exist prior to the creation of the first Blue Ribbon Citizen's Committee.

Regardless of the various new aspects that this new Blue Ribbon Citizen's Committee will need to explore, several important factors remain constant. For this to be successful an in-depth evaluation of the current state of affairs must again come from a coalition of public interest attorneys, organizers, tenants' rights groups, academics, and religious leaders. A strong coalition of important individuals and organizations will give the Blue Ribbon Citizen's Committee the ability to successfully frame the issue of slum housing as a legal, moral, economic, and human rights issue while simultaneously taking advantage of and utilizing the various social connections each coalition member brings to the Blue Ribbon Citizen's Committee. Each coalition partner will be able to support the argument for reform from a different angle and encourage mobilizing power whether it be from statistical angle, a legal angle, or a religious angle.

It is important to recognize that the establishment of a current Blue Ribbon Citizen's Committee, in and of itself, will not trigger complete rental reform, but that it is the potential of the mobilization of the public that makes the recreation of the Blue Ribbon Citizen's Committee lucrative. The release of an updated report has the potential to remind the general public that beyond the foreclosure and homeownership crisis, low-income tenants are living in homes that endanger their health and violate their rights.

Once informed the public will have the power to, yet again, demand reform, challenge unfair regulations, and pressure elected officials such as City Council members and the office of the City Attorney to take proactive stances to end slum housing conditions. It is no guarantee that the Blue Ribbon Citizen's Committee will necessarily

reform Los Angeles rental policies and programs to end slum housing, but without a large-scale initiative to bring this issue to the public's attention and encourage public support and pressure it will remain a problem in Los Angeles indefinitely.

In conclusion, there exists no easy fix for the slum housing problem for the city of Los Angeles. The slum housing problem is wrapped up in a greater economic context and is affected by social structures and systems which privilege certain individuals while systematically disadvantaging others and violating their rights as humans. For slum housing to be completely eliminated it will require reforms on the city, county, state and even federal level to preserve and increase the affordable housing stock and end the underlying causes of slum housing.

By analyzing the current city enforcement policies, we can see that although innovative, the Rent Stabilization Ordinance, Systematic Code Enforcement Program, and Rent Escrow Account Program are far reaches from fully supporting and protecting tenants living in slum conditions. Upon closer look, it becomes obvious that changes and reforms must be made to best support those living in slum housing and encourage swifter code compliance and discourage landlord negligence. There must be a broad political shift and reorientation of priorities for these reforms to take hold.

In no way can this report solve the slum housing problem or end housing inequalities, but it can provide the city of Los Angeles as a case study for improving slum housing conditions through the utilization of a human rights framework. The analysis and critiques of these policies and programs through this framework remind us that investigating housing issues should not be an optional endeavor but that fixing

inequalities and reforming housing policies can help realize the rights that should be guaranteed to all regardless of their race, class, or country of origin.

Bibliography

Abelsohn, Alan, and Margaret Sanborn. 2010. "Lead and children." *Canadian Family Physician* 56. Envriionment and Health Series (June): 531-535.

Adams, Mark, Gary Blasi, and et al. 1997. *The Slum Housing Problem In Los Angeles and The Department of Building and Safety- Interim Report Number 1 of the Blue Ribbon Citizens' Committee on Slum Housing*. July 28.

Breysse, Patrick, Nick Farr, Warren Galke, Bruce Lanphear, Rebecca Morley, and Linda Bergofsky. 2004. "The Relationship between Housing and Health: Children at Risk." *Children's Health* 112 (15). Environmental Health Perspectives (November).

Chick, Laura. 2007. *Follow-Up Audit of the Housing Department's Systematic Code Enforcement Program (SCEP)*. Audit. City of Los Angeles Office of the Controller, July 16. http://controller.lacity.org/Audits_and_Reports/index.htm.

Coalition for Economic Survival. Los Angeles City Council Denies Equity and Justice to Tenants «Organizing Times. <http://blog.cesinaction.org/2011/10/26/los-angeles-city-council-denies-equity-and-justice-to-tenants/>.

Collins, William J, and Katharine Shester. 2010. *The Economic Effects of Slum Clearance and Urban Renewal in the United States*. Working Paper. Department of Economics, Vanderbilt University, October.
<http://econpapers.repec.org/paper/vanwpaper/1013.htm>.

Dreier, Peter. 2007. "L.A. renters strike back." *Los Angeles Times*.
<http://www.latimes.com/news/opinion/commentary/la-op-dreier27may27,0,6176874.story>. May

Eddy, Christopher, and Susan Jones. 2011. "Bed Bugs, Public Health, and Social Justice: Part 1, A Call to Action." *Journal of Environmental Health* 73 (8) (April): 8-14.

Fraser, Steve. In the Last Gilded Age, People Stood Up to Greed -- Why Aren't We? | Economy | AlterNet. <http://www.alternet.org/economy/83668/?page=1>.

Gary Bess Associates. 2001. *Los Angeles Systematic Code Enforcement Program Evaluation*. Audit. City of Los Angeles Office of the Controller, November 13. http://controller.lacity.org/Audits_and_Reports/index.htm.

Gibson, Marcia, Mark Petticrew, Clare Bambra, Amanda Sowden, Kate Wright, and Mararet Whitehead. 2011. "Housing & Health Inequalities: A synthesis of systematic reviews of interventions aimed at different pathways linking housing and health." *Health & Place* (17): 175-184.

Grigsby, William G. 1964. "Housing and Slum Clearance: Elusive Goals." *Annals of the American Academy of Political and Social Science* 352 (March 1): 107-118.

Hermosillo, Jesus, and Soham Patel. SAJE. 2011. Preliminary analysis of active REAP cases list. December 6.

Joint Center for Housing Studies. 2011. *The State of the Nation's Housing*. Harvard University.

Los Angeles Housing Department. Background: Affordable Housing Trust Fund. *Los Angeles Housing Department*.

<http://lahd.lacity.org/lahdinternet/AffordableHousingTrustFund/tabid/126/language/en-US/Default.aspx>.

Los Angeles Housing Department. CEU - Programs.

<http://lahd.lacity.org/lahdinternet/CodeEnforcement/Programs/tabid/390/language/en-US/Default.aspx>.

Los Angeles Housing Department. Mission Statement.

<http://lahd.lacity.org/lahdinternet/AboutUs/MissionStatement/tabid/120/language/en-US/Default.aspx>.

Los Angeles Housing Department. City of Los Angeles. Rent Stabilization Ordinance.

<http://lahd.lacity.org/lahdinternet/RSO/tabid/263/language/en-US/Default.aspx>.

Lowe, Albert, Gilda Haas, and eds. 2007. *Shame of the City: Slum Housing and the Critical Threat to the Health of L.A. Children and Families*. Los Angeles: Strategic Actions for a Just Economy, April.

Matte, Thomas, and David Jacobs. 2000. "Housing and Health- Current Issues and Implications for Research and Programs." *Journal of Urban Health: Bulletin of the New York Academy of Medicine* 77 (1) (March).

Montague, Peter. 2012. "One of Congress's Most Damaging (and Racist) Budget Cuts That Flew Under the Radar." *AlterNet*, February 7.

http://www.alternet.org/environment/154005/one_of_congress%27s_most_damaging_%28and_racist%29_budget_cuts_that_flew_under_the_radar/?page=1.

Morris, James. 2008. "Poverty of the Imagination: A Review of 'The Other Half: The Life of Jacob Riis and the World of Immigrant America' by Tom Buk-Sweinty; Annette Buk-Sweinty." *The Wilson Quarterly* 32 (4): 96-97.

Office of the City Attorney. City of Los Angeles:

http://atty.lacity.org/OUR_OFFICE/Mission/index.htm.

National Center for Healthy Housing. 2009. *Housing Interventions and Health: A review of the Evidence*. January.

Pitkin, Bill. 2002. Did I say slums? Housing Reform in the City of Los Angeles presented at the Association of Collegiate Schools of Planning (ACSP) Conference, November 23, Baltimore, Maryland.

Rauh, Virginia, Philip Landrigan, and Luz Claudio. 2008. "Housing and Health: Intersection of Poverty and Environmental Exposures." *New York Academy of Sciences*. doi:10.1196.

SAJE. 2010. *Slumlord Who's Building Collapsed with Tenants Inside Sentenced in Criminal Charges for Slum Conditions*. (April). News Release.

Schwartz, Alex F. 2010. *Housing Policy in the United States, Second Edition*. 2nd ed. T & F Books US, February 8.

Shaw, Mary. 2004. *Housing and Public Health*. Annual Review of Public Health 25.1: 397-419.

South Los Angeles Declaration of Health and Human Rights. 2009
<http://www.southlahealthandhumanrights.org/declaration.html>.

The Healthy Neighborhoods Same Neighbors Collaborative. *Shame of the City- The Sequel- Slum Housing: L.A.'s Hidden Health Crisis (Enhancing Community Health by Improving Housing and Health Practices, Aligning Government Priorities and Increasing the Power of Tenants)*.

The United Nations. The Universal Declaration of Human Rights. (UDHR)
<http://www.un.org/en/documents/udhr/>.

Thomson, Hilary, Mark Petticrew, and David Morrison. 2001. "Health Effects of Housing Improvement: systematic review of intervention studies." *BMJ* 323 (July 28): 187-190.

U.S. Census Bureau, American FactFinder, American Community Survey 2010, S1701, 1-year estimates

U.S. Census Bureau. *American Housing Survey for the Los Angeles-Long Beach Metropolitan Area: 2003*. Current Housing Reports.

U.S. Census Bureau. *American Housing Survey for the Los Angeles-Long Beach Metropolitan Area: 1995*. Current Housing Reports.

U.S. Department of Housing and Urban and Development. HUDUSER Dataset. (2012) FY2012 Fair Market Rent Documentation System: The Final FY 2012 Los Angeles County FMRs for All Bedroom Sizes,
http://www.huduser.org/portal/datasets/fmr/fmrs/FY2012_code/2012summary.odn

U.S. Department of Housing and Urban and Development. HUDUSER Dataset. (2012) FY2012 Fair Market Rent Documentation System: FYI 2012 Income Limits Summary FMRs, <http://www.huduser.org/portal/datasets/il/il2012/2012summary.odn>

Woolf, Steven and Paula Braveman. 2011. “Where Health Disparities Begin: The Role of Social and Economic Determinants- and why current policies may make matters worse.” Health Affairs 30 (10) (October): 1852-1859

Appendix A- List of Interviewees and Their Affiliations

Maya Abood, Organizer/Grassroots Media Coordinator, SAJE

Jose Barrera, Organizer, SAJE

Roberto Bustillo, Organizer, L.A. Voice

Anne Farrell-Scheffer, Director of Environmental Health Projects, St. John's Well Child
and Family Center

Favian Gonzalez, Organizing Coordinator, SAJE

Lary Gross, Executive Director, Coalition for Economic Survival

Cynthia Guzman, Master's Student at UCLA School of Public Policy

Andres Ramirez, Tenant Organizer, Strategic Actions for a Just Economy

Gloria Serrano, Tenant Organizer, Strategic Actions for a Just Economy

Greg Spiegel, Director of Public Policy and Communications, Inner City Law Center



3550 Wilshire Blvd
Los Angeles, CA 90010
(213) 252-2800

October 24, 2011

Case Number: [REDACTED]
APN: [REDACTED]

Property Owner: [REDACTED]

Mailing Address: [REDACTED]

In Addition Notify:

Mailing Address: [REDACTED]

NOTICE AND ORDER TO COMPLY

Sections 161.702 and 161.354, Los Angeles Municipal Code
Sections 17980 and 17980.6, California Health and Safety Code

Our records indicate you are the owner of the property located at [REDACTED] WALL ST. An inspection of the premises has revealed conditions that affect the health and safety of the occupants and cause the building to be determined to be in violation of the City of Los Angeles Municipal Code. These conditions, their location on the premises, and the specific violation(s) of the Los Angeles Municipal Code (LAMC) and or California Health and Safety Code are described on the attached pages.

You, as the property owner, or responsible party, are ordered to eliminate all of the described conditions and diligently pursue the work necessary to eliminate any violations of the LAMC and Health and Safety Code on or before **11/30/2011**.

Some of the work required to repair the building may require that you obtain a permit and request related inspections from the Department of Building and Safety. We strongly urge you to seek the services of qualified installers, properly licensed by the State Contractors License Board.

A re-inspection of the premises will be conducted on **12/1/2011** between **10:00 AM** and **12:00 PM**. You or your representative must be present to escort the Housing Inspector. Any and all units are subject to re-inspection and require the same uniform compliance throughout the premises. You must provide notice to all affected tenants not less than 24 hours prior to the scheduled inspection. The entire premises must be in full compliance with the Los Angeles Municipal Code. Any questions you have may be directed to the office identified at the top of this notice. *Si tiene preguntas, favor de llamar al número que se encuentra al principio de esta notificación.*

Issuing Inspector: Ricardo Bohorquez

Proof of Mailing -- On 10/24/2011 the undersigned mailed this notice by regular mail, postage prepaid, to the person(s) listed on the last equalized assessment roll.

A handwritten signature in black ink, appearing to read 'Ricardo Bohorquez'.

FIRE SAFETY

Failure to provide and maintain the required permanently wired, with battery back-up, smoke detectors at all sleeping rooms, and areas adjacent to sleeping rooms. Sections 91.310.9.1.1; 91.310.9.1.4; 91.310.9.1.5; 91.8603.1.1; 91.8603.1.2 L.A.M.C.; 17920.3(m) H.&S.C.)

██████████ WALL ST 201
BEDROOM1

██████████ WALL ST 205
BEDROOM1

██████████ WALL ST 304
BEDROOM1

SANITATION

Failure to maintain dwelling unit in a safe and sanitary condition. Sections 91.8102.2; 91.8104.2 L.A.M.C.; 17920.3(j) H.&S.C.

██████████ WALL ST 303
BEDROOM1, Note: Remove excessive storage.

Failure to maintain habitable room(s) free from dampness. Section 17920.3(a)11 H.&SC.

██████████ WALL ST 103
HALL BATH, Note: Dampness in room is causing water damage. Correct source of damage

██████████ WALL ST 104
KITCHEN, Note: Dampness in room is causing water damage. Correct source of damage

██████████ WALL ST 105
HALL BATH, Note: Dampness in room is causing water damage. Correct source of damage

██████████ WALL ST 205
HALL BATH, Note: Dampness in room is causing water damage. Correct source of damage.

Failure to maintain the premises free from vermin and/or rodent infestations. Sections 91.8902.1.12; 91.8104 L.A.M.C.; 17920.3(j) H.&S.C.

██████████ WALL ST 102
KITCHEN, Note: Take measures to abate roaches. Provide receipts.

██████████ WALL ST 103
ENTIRE UNIT, Note: Take measures to abate roaches. Provide receipts.

██████████ WALL ST 105
KITCHEN, Note: Roach Infestation Problem:Take measures to abate. Provide receipts.

██████████ WALL ST 204
Entire Unit, Note: Roach Infestation: Take measures to abate. Provide receipts.

██████████ WALL ST 206
Entire Unit, Note: Roach Infestation Problem:Take measures to abate. Provide receipts.

██████████ WALL ST 302

ENTIRE UNIT, Note: Roach Infestation Problem:Take measures to abate. Provide receipts.

██████████ WALL ST 304

Entire Unit, Note: Roach Infestation:Take measures to abate. Provide receipts.

██████████ WALL ST 306

Entire Unit, Note: Roach Infestation : Take measures to abate. Provide receipts.

Failure to maintain the required window and/or door insect screens. Sections. 91.8104.5 L.A.M.C.; 17920.3(c) H.&S.C.

██████████ WALL ST 101

LIVING ROOM, Note: Replace torn/missing/detective window screens.

██████████ WALL ST 103

LIVING ROOM, Note: Insect Screens, Replace Defective or missing Secure loose fitting one

██████████ WALL ST 201

LIVING ROOM, Note: Insect Screens, Replace Defective or missing Secure loose fitting one

██████████ WALL ST 205

LIVING ROOM, Note: Insect Screens, Replace Defective or missing Secure loose fitting one

██████████ WALL ST 303

LIVING ROOM, Note: Insect Screens, Replace Defective or missing Secure loose fitting one

██████████ WALL ST 306

LIVING ROOM, Note: Replace torn/missing/detective window screens.

MAINTENANCE

Failure to maintain the existing building, structure, premises, or portion thereof in conformity with the code regulations and department approvals in effect at the time of construction. Section 91.8104 L.A.M.C.

██████████ WALL ST 102

BEDROOM2, Note: closet doors

██████████ WALL ST 102

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████████ WALL ST 103

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████████ WALL ST 104

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████████ WALL ST 105

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████████ WALL ST 202

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████████ WALL ST 206

LIVING ROOM, Note: Nails protruding over linoleum.

2335 S WALL ST 206

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████ WALL ST 302

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████ WALL ST 306

KITCHEN, Note: Cabinets: Repair/replace doors,drawers,framing or hardware.

██████ WALL ST 306

HALL BATH, Note: Secure/ replace loose tile above bath.

Failure to maintain the counters/drain boards for kitchen sinks, bathroom lavatories, and adjacent wall and/or floor surfaces in a manner to prevent water damage, and/or in a clean and sanitary condition and free from dirty or foreign materials. Sections 91.8104.7 L.A.M.C.; 17920.3(a)13 H.&S.C.

██████ WALL ST 101

KITCHEN, Note: Repair/ reglaze or replace.

██████ WALL ST 102

KITCHEN

██████ WALL ST 103

KITCHEN, Note: Peeling paint.

██████ WALL ST 104

KITCHEN, Note: Replace broken tile. Grout or re-attach as needed

██████ WALL ST 204

KITCHEN, Note: Repair/ reglaze or replace.

██████ WALL ST 205

KITCHEN

██████ WALL ST 302

KITCHEN

██████ WALL ST 304

KITCHEN

██████ WALL ST 306

KITCHEN

Failure to maintain windows, doors, cabinets, and frames operable, clean and sanitary and in good repair. Sections 91.8104.5 L.A.M.C.; 17920.3.a.13 H.&S.C.

██████ WALL ST 103

HALL

██████ WALL ST 104

HALL

██████ WALL ST 105

HALL, Note: Replace missing door hardware.

Failure to maintain safe and sanitary floor covering. Sections 91.8104.6 L.A.M.C.; 17920.3(a)13 H.&S.C.

██████ WALL ST 103

LIVING ROOM, Note: Flooring: Repair/Replace @ Transitions or where needed.

██████████ WALL ST 103

HALL, Note: Flooring: Repair/Replace @ Transitions or where needed.

██████████ WALL ST 202

LIVING ROOM, Note: Flooring: Repair/Replace @ Transitions or where needed.

██████████ WALL ST 202

HALL BATH

██████████ WALL ST 204

HALL

██████████ WALL ST 206

KITCHEN

██████████ WALL ST 302

KITCHEN, Note: Flooring: Repair/Replace @ Transitions or where needed.

██████████ WALL ST 302

HALL BATH

██████████ WALL ST 303

LIVING ROOM, Note: Flooring: Repair/Replace @ Transitions or where needed.

██████████ WALL ST 303

KITCHEN

██████████ WALL ST 304

HALL

██████████ WALL ST 306

LIVING ROOM, Note: Flooring: Repair/Replace @ Transitions or where needed.

Failure to maintain plaster/drywall walls/ceilings in a smooth and sanitary condition. Sections 91.8104; 91.8104.4; 91.8104.5.1 L.A.M.C.; 17920.3(a)13 H.&S.C.

██████████ WALL ST 101

LIVING ROOM, Note: Patch and paint where needed.

██████████ WALL ST 101

KITCHEN, Note: Patch and paint where needed.

██████████ WALL ST 101

HALL, Note: Patch and paint where needed.

██████████ WALL ST 102

KITCHEN, Note: Patch and paint where needed.

██████████ WALL ST 103

HALL BATH

██████████ WALL ST 103

KITCHEN

██████████ WALL ST 104

KITCHEN

██████████ WALL ST 104

BEDROOM1, Note: Window area.

██████████ WALL ST 104
HALL BATH

██████████ WALL ST 104
ENTRY, Note: Peeling paint or door.

██████████ WALL ST 105
HALL BATH, Note: Repair ceiling and paint.

██████████ WALL ST 105
LIVING ROOM, Note: Patch and paint where needed.

██████████ WALL ST 105
BEDROOM1, Note: Patch and paint where needed.

██████████ WALL ST 106
HALL, Note: Reeling paint on door.

██████████ WALL ST 202
BEDROOM1, Note: Peeling paint on door

██████████ WALL ST 203
HALL, Note: Peeling paint on door.

██████████ WALL ST 204
HALL, Note: Peeling paint on door.

██████████ WALL ST 205
ENTRY, Note: Peeling paint on entry door.

██████████ WALL ST 205
HALL BATH

██████████ WALL ST 206
HALL BATH

██████████ WALL ST 301
ENTRY, Note: Peeling paint on door.

██████████ WALL ST 302
BEDROOM1, Note: Patch and paint near window.

██████████ WALL ST 303
HALL BATH, Note: Door

██████████ WALL ST 304
BEDROOM1, Note: Peeling paint on door.

██████████ WALL ST 306
LIVING ROOM

██████████ WALL ST 306
HALL

██████████ WALL ST 306
HALL BATH

ELECTRICAL

Failure to maintain the electrical service, lines, switches, outlets, fixture coverings, and supports in good repair and free from broken, loose, frayed inoperative, defective or missing portions, or wiring that may be a danger to life, limb, health, safety, or welfare of the public, or the occupants of the premises. Sections 17920.3(d) H&SC; Sections 91.8104.8; 93.0104; 93.0311; 93.0314 L.A.M.C.

██████████ WALL ST 302

HALL, Note: Provide cap on missing circuits

██████████ WALL ST 303

HALL, Note: Provide cap on missing circuits

██████████ WALL ST 304

HALL, Note: Provide cap on missing circuits

Failure to maintain the required switch/receptacle cover plates, grounding means, in good repair and free from defects or missing portions. Sections 91.8104.8; 93.0311; L.A.M.C.; 380-9(a), (b) and/or (c); 410-56(d) N.E.C.; 17920.3(d) H.&S.C.

██████████ WALL ST 104

LIVING ROOM

PLUMBING

Failure to maintain the plumbing system free from defective, damaged/leaking faucets or plumbing fixtures. Sections 91.8104.7; 94.0101.5.5; L.A.M.C.; 17920.3.c; 17920.3.e H.&S.C.

██████████ WALL ST 102

KITCHEN, Note: Under sink

██████████ WALL ST 102

HALL BATH, Note: Leaking Plumbing Fixtures: Sink and bathtub.

██████████ WALL ST 201

KITCHEN, Note: Broken stem of faucet.

██████████ WALL ST 202

HALL BATH, Note: Replace broken, cracked toilet.

██████████ WALL ST 204

HALL BATH

██████████ WALL ST 205

KITCHEN, Note: Sink.

██████████ WALL ST 302

HALL BATH, Note: Leaking Plumbing Fixture, Repair @ bathtub

██████████ WALL ST 303

HALL BATH, Note: Toilet.

██████████ WALL ST 306

HALL BATH, Note: Sink

Failure to provide and maintain undamaged, sealed, and sanitary surfaces of plumbing fixtures. Sections 91.8104.7; 94.0303.1.1 L.A.M.C.; 17920.3(e) H.&S.C.

██████ WALL ST 102
KITCHEN

██████ WALL ST 103
KITCHEN, Note: Plumbing Fixture Surface: Repair or Replace @ Sink

██████ WALL ST 202
KITCHEN, Note: Plumbing Fixture Surface: Repair or Replace @ Sink

██████ WALL ST 204
KITCHEN

██████ WALL ST 205
HALL BATH

██████ WALL ST 205
KITCHEN

██████ WALL ST 206
HALL BATH, Note: Bathtub.

██████ WALL ST 302
KITCHEN, Note: Sink

██████ WALL ST 302
HALL BATH, Note: Repair/reglaze bathtub.

██████ WALL ST 304
KITCHEN

██████ WALL ST 306
KITCHEN

Failure to provide and maintain a positive seal (caulk or grout) between plumbing fixtures at contact point with walls and/or floors.
Sections 91.8104.7; 94.0408.2 L.A.M.C.; 17920.3(c) H.&S.C.

██████ WALL ST 101
HALL BATH, Note: Bathtub

██████ WALL ST 102
HALL BATH, Note: Caulk/Grout/Tile,Sinks,Fixtures,Countertops,Splashboard as needed.

██████ WALL ST 103
HALL BATH

██████ WALL ST 104
KITCHEN, Note: Caulk/Grout/Tile,Sinks,Fixtures,Countertops,Splashboard as needed.

██████ WALL ST 105
HALL BATH

██████ WALL ST 201
HALL BATH, Note: Bathtub

██████ WALL ST 204
HALL BATH, Note: Bathtub and sink

██████████ WALL ST 206

HALL BATH, Note: Sink, bathtub and toilet.

██████████ WALL ST 206

KITCHEN, Note: Sink

██████████ WALL ST 303

HALL BATH, Note: Bathtub and sink.

██████████ WALL ST 303

KITCHEN, Note: Sink.

██████████ WALL ST 304

KITCHEN, Note: Sink

██████████ WALL ST 304

HALL BATH, Note: Bathtub and sink.

██████████ WALL ST 306

KITCHEN, Note: Sink

██████████ WALL ST 306

HALL BATH, Note: Bathtub.

Failure to properly secure loose plumbing fixtures. Sections 91.8104.7 L.A.M.C.; 17920.3(c) H.&S.C.

██████████ WALL ST 204

HALL BATH, Note: Sink.

██████████ WALL ST 302

HALL BATH, Note: Toilet.

██████████ WALL ST 303

HALL BATH, Note: Toilet.

HEATING AND VENTILATION

Failure to maintain the required mechanical or natural bathroom ventilation. Sections 91.1201; 91.1203.3; 91.3402; 91.8104 L.A.M.C.; 17920.3(c)7 H.&S.C.

██████████ WALL ST 303

HALL BATH, Note: Repair/ replace.

██████████ WALL ST 304

HALL BATH, Note: Repair or replace.

██████████ WALL ST 306

HALL BATH

ACCESS FOR NEW UNIT INSPECTION

Make arrangements to provide access for inspection of all units that were not inspected on the initial inspection. Section 161.601L.A.M.C.

██████████ WALL ST 207

Entire Unit

█████ WALL ST 301
ENTIRE UNIT

█████ WALL ST 305
Entire Unit

█████ WALL ST 307
ENTIRE UNIT

FIRE SAFETY

Failure to provide and/or maintain the required self-closing, self-latching area and/or occupancy separation fire doors. Sections 91.302.4; 91.8604.5.4; 91.713.6.3 L.A.M.C.; 17920.3.a.13 H.&S.C.
INTERIOR, Note: Repair

█████ WALL ST

SANITATION

Failure to maintain the required window and/or door insect screens. Sections. 91.8104.5 L.A.M.C.; 17920.3(c) H.&S.C.
LAUNDRY, Note: Insect Screens, Replace Defective or missing Secure loose fitting one

█████ WALL ST

WEATHER PROTECTION

Failure to paint all exposed building surfaces to maintain exterior weatherproofing. Section 91.8104.1 L.A.M.C. Attention: Buildings constructed prior to 1978 may contain lead-based paint. For more information with regard to your lead hazards responsibilities call the Los Angeles County Health Department at (800) 524-5323.

EXTERIOR, Note: Graffiti

█████ WALL ST

Failure to maintain broken, split, decayed, or buckled exterior walls, weather tight, in good repair and in a clean condition. Sections 91.8104.12 L.A.M.C.; 17920.3(b)4; 17920.3(g)4 H.&S.C.

EXTERIOR, Note: Repair in an approved manner

█████ WALL ST

MAINTENANCE

Failure to maintain the existing building, structure, premises, or portion thereof in conformity with the code regulations and department approvals in effect at the time of construction. Section 91.8104 L.A.M.C.

EXTERIOR, Note: Remove trash and debris from roof.

█████ WALL ST

Failure to maintain windows, doors, cabinets, and frames operable, clean and sanitary and in good repair. Sections 91.8104.5 L.A.M.C.; 17920.3.a.13 H.&S.C.

COMMON, Note: Repair/replace all common doors and door hardware.

█████ WALL ST

INTERIOR, Note: Replace missing door hardware.

█████ WALL ST

Failure to maintain safe and sanitary floor covering. Sections 91.8104.6 L.A.M.C.; 17920.3(a)13 H.&S.C.
INTERIOR, Note: Repair/Replace @ Transitions or where needed. (carpet duct taped)

█████ WALL ST

Failure to maintain plaster/drywall walls/ceilings in a smooth and sanitary condition. Sections 91.8104; 91.8104.4; 91.8104.5.1 L.A.M.C.; 17920.3(a)13 H.&S.C.

INTERIOR, Note: Halls in need of paint.

██████████ WALL ST

ELECTRICAL

Failure to maintain the electrical service, lines, switches, outlets, fixture coverings, and supports in good repair and free from broken, loose, frayed inoperative, defective or missing portions, or wiring that may be a danger to life, limb, health, safety, or welfare of the public, or the occupants of the premises. Sections 17920.3(d) H&SC; Sections 91.8104.8; 93.0104; 93.0311; 93.0314 L.A.M.C.

INTERIOR, Note: Loose digital telephone service box in hall.

██████████ WALL ST

LAUNDRY, Note: Damaged conduit on water heater.

██████████ WALL ST

Maintaining electrical wiring without obtaining an electrical permit and the required inspection approvals from the Department of Building and Safety for all new wiring. Sections 93.0104; 93.0201; 93.0304; 93.0314 L.A.M.C.; 17920.3(d) H.&S.C.

COMMON, Note: Secure loose smoke detectors.

██████████ WALL ST

Inspector Name [REDACTED]
Office Location 3550 Wilshire Blvd
Suite #1500
Los Angeles, CA 90010
Survey Date 8/17/2011

WHERE INDICATED ABOVE, PLANS AND/OR A BUILDING PERMIT FROM THE DEPARTMENT OF BUILDING AND SAFETY IS REQUIRED TO BE OBTAINED BEFORE REPAIR OR DEMOLITION WORK IS STARTED.

For consultation regarding this notice, or for information regarding obtaining Permits, the inspector whose name appears on this Notice may be contacted by telephone between the hours of 7:30 and 9:00 a.m., Monday through Friday.

YOU MAY BE SCHEDULED FOR A GENERAL MANAGER'S HEARING, AND A LIEN MAY BE RECORDED AGAINST YOUR PROPERTY FOR ALL ADMINISTRATIVE AND INSPECTION COSTS ASSOCIATED WITH YOUR FAILURE TO COMPLY WITH THIS ORDER.

FAILURE TO COMPLY WARNING

You may be scheduled for a General Manager's hearing, and a lien may be recorded on this property for all administrative and inspection costs associated with your failure to comply with this notice and order. This matter may be referred to the City Attorney for further enforcement. Any person who violates or causes or permits another person to violate any provision of the Los Angeles Municipal Code is guilty of a misdemeanor, which is punishable by a fine of not more than \$1,000.00 and/or six months imprisonment per LAMC Section 11.00 (m).

LEAD HAZARD WARNING

Due to the possible presence of lead-based paint, lead safe work practices are required on all repairs in pre-1979 buildings that disturb paint. Failure to do so could create lead hazards that violate California Health and Safety Code Section 17920.10 and 105256 and may be subject to a \$1,000.00 fine or criminal prosecution. For more information call the L.A. Housing Department at (866) 557-7368. In order to locate a Lead Certified Professional and obtain additional information, call the L.A. Housing Department at (866) 557-7368 or go to the California Department of Health Services Website at: <http://www.dhs.ca.gov/childlead/html/GENclist.html>.

TAX WARNING

The Housing Department has determined this building to be substandard per Section 24436.5 of the State Revenue and Taxation Code. This section provides in part that a taxpayer who derives rental income from housing determined by the local regulatory agency to be substandard by reason of violation of state and local codes dealing with health, safety, or building, cannot deduct from state personal income tax and corporate income tax, deductions for interest, depreciation, or taxes attributable to such substandard structure where the substandard conditions are not corrected within six (6) months after notice of violation by the regulatory agency. Please note that the Compliance Date of this order marks the beginning of the six (6) month period. The department is required by law to notify the State Franchise Tax Board of failure to comply with these codes.

SUBSTANDARD NOTIFICATION

When a building is determined to be a substandard building as defined under Section 17920.3 of the Health and Safety Code, a Notice of Non Compliance is recorded at the Los Angeles County Recorders Office (Health and Safety Code section 17985).

RENT ESCROW ACCOUNT PROGRAM (REAP) NOTICE

Failure to correct the conditions that constitute the violations specified by this notice may subject this property and units to inclusion in the City of Los Angeles Rent Escrow Account Program (REAP). Inclusion in REAP entails a rent reduction based on the level of severity of the uncorrected conditions, and allows the tenant to pay the reduced rent to the City instead of the landlord. (Sections 162.00, et. seq. LAMC)

INSPECTION AND PENALTY FEES

If the conditions found during a Systematic Code Enforcement Program(SCEP) inspection remain uncorrected after the first reinspection, Los Angeles Municipal Code Section 161.901.1 & 2 require that the Departments cost of all subsequent re-inspections be billed to the property owner. All Complaint-based inspections where a Notice to Comply is issued will be billed to the property owner. A late charge penalty equal to two times the fee or cost and a collection fee equal to 50 percent of the original fee or cost shall be imposed if any fees or costs imposed by this division are not paid within 30 days of service of the notice of the imposition of the fee or costs or, if timely appealed, of any decision on the appeal. Any person who fails to pay the assessment fee or cost, penalty, or collection fee shall also pay interest at the rate of one percent per month, or fraction thereof, on the amount of the fee or cost, penalty and collection fee imposed, from the 60th day following the date the billing notice was mailed. (Sections 161.901, et seq.)

CITATIONS

A citation requiring a personal appearance in court may be issued if compliance is not obtained by the compliance date. Violation of the Los Angeles Municipal Code may be a misdemeanor or infraction and is punishable by a fine of not more than \$1,000.00 and/or six (6) months imprisonment. (Sections 161.410 and 11.00(m) LAMC.)

APPEALS

As of May 1, 2008 an Appeal Processing Fee of \$128.00 shall be paid to the Department prior to processing the Appeal and obtaining a determination from a Senior Inspector. Section 161.902 of the Los Angeles Municipal Code.

Any person or entity subject to a notice or order or an inspection fee without hearing, pursuant to Section 161.901, et. seq. may request to appeal the notice, order, or fee, or may request an extension of time from, a Senior Inspector. The request to appeal shall be made in writing, upon appropriate forms provided by the department, and shall specify the grounds for appeal. The appeal shall be filed within ten days of the issuance of the notice or order, or within 10 days of the imposition of the fee. (Section 161.00 161.1001.1 LAMC.)

PROPERTY MANAGEMENT TRAINING PROGRAM (PMTP)

When a property owner has failed to comply with a notice or order within 45 days or less of the specified compliance date, the owner is required to pay a \$225.00 registration fee and attend PMTP training sessions. The registration fee must be paid directly to the approved training agency. Failure to comply may result in the imposition of a criminal infraction, punishable by a fine of \$250.00. (Section 154.02, et seq. LAMC.)

RETALIATION

No lessor may retaliate against a lessee because of his complaint to an appropriate agency as to the tenantability of a dwelling pursuant to Section 1942.5 of the Civil Code.

HISTORICAL PRESERVATION

Your property might be located within a Historical Preservation Overlay Zone, or may otherwise be determined historically significant. The scope of work required to correct conditions that constitute violations specified in this notice may require advanced approval from the appropriate regulatory agency.

RELOCATION INFORMATION

Any tenant who is displaced or subject to displacement from a residential rental unit as a result of a Notice to Vacate or any order requiring the vacating of the unit by the Enforcement Agency, shall be entitled to relocation benefits payable by the landlord to the tenant in each unit in the amounts prescribed in Section 163.05 L.A.M.C. Furthermore if the landlord fails, neglects, or refuses to pay relocation payments, the City may advance relocation payments to the affected tenant(s). Recovery of the relocation payments plus a penalty of 50% will be assessed against the property in the form of a lien as per H&S Code Section 50657(b).

COMPLIANCE

A property owner has complied with this Notice/Order to Comply when an Inspector from the Los Angeles Housing Department had verified the abatement of the cited violations in conformity with the requirements of the Los Angeles Municipal Code. Section 161.355, 161.403, & 91.108.6 L.A.M.C.

Los Angeles Housing Department

Inspection Report

Reinspection Date: 12/1/2011 10:00:00 AM
 APN: 5127013027 Address: [REDACTED] S WALL ST
 Inspector Name: [REDACTED]

Address	Room	Description	Permit	Notes
[REDACTED] WALL ST	COMMON	EXPOSED WIRING		Secure loose smoke detectors.
	COMMON	WINDOW/DOOR MAINT		Repair/replace all common doors and door hardware.
	EXTERIOR	GENERAL MAINTENANCE		Remove trash and debris from roof.
	EXTERIOR	EXTERIOR PAINT		Graffiti
	EXTERIOR	EXTERIOR WALLS		Repair in an approved manner.
	INTERIOR	ELECTRICAL-GENERAL		Loose digital telephone service box in hall.
	INTERIOR	FIRE DOORS		Repair
	INTERIOR	FLOOR COVERING		Repair/Replace @ Transitions or where needed. (carpet duct taped)
	INTERIOR	INTER-WALLS/CEILING		Halls in need of paint.
	INTERIOR	WINDOW/DOOR MAINT		Replace missing door hardware.
	LAUNDRY	ELECTRICAL-GENERAL		Damaged conduit on water heater.
	LAUNDRY	INSECT SCREENS		Insect Screens. Replace Defective or missing Secure loose fitting one
[REDACTED] WALL ST 101	HALL	INTER-WALLS/CEILING		Patch and paint where needed.
	HALL BATH	CAULKING		Bathtub
	KITCHEN	COUNTER/DRAINBOARD		Repair/ reglaze or replace.
	KITCHEN	INTER-WALLS/CEILING		Patch and paint where needed.
	LIVING ROOM	INTER-WALLS/CEILING		Patch and paint where needed.
	LIVING ROOM	INSECT SCREENS		Replace torn/missing/detective window screens.
[REDACTED] WALL ST 102	BEDROOM2	GENERAL MAINTENANCE		closet doors
	HALL BATH	CAULKING		Caulk/GROUT/Tile,Sinks,Fixtures,Countertops,Splashboard as needed.
	HALL BATH	Fixture DEF/LEAK		Leaking Plumbing Fixtures: Sink and bathtub.
	KITCHEN	COUNTER/DRAINBOARD		
	KITCHEN	GENERAL MAINTENANCE		Cabinets: Repair/replace doors,drawers,framing or hardware.
	KITCHEN	INTER-WALLS/CEILING		Patch and paint where needed.
	KITCHEN	Fixture DEF/LEAK		Under sink
	KITCHEN	PLMG FIXTURE SURFACE		
	KITCHEN	INFESTATION		Take measures to abate roaches. Provide receipts.
[REDACTED] WALL ST 103	ENTIRE UNIT	INFESTATION		Take measures to abate roaches. Provide receipts.
	HALL	FLOOR COVERING		Flooring: Repair/Replace @ Transitions or where needed.
	HALL	WINDOW/DOOR MAINT		
	HALL BATH	INTER-WALLS/CEILING		Dampness in room is causing water damage. Correct source of damage
	HALL BATH	CAULKING		Peeling paint.
	HALL BATH	DAMPNESS IN ROOMS		Cabinets: Repair/replace doors,drawers,framing or hardware.
	KITCHEN	COUNTER/DRAINBOARD		
	KITCHEN	GENERAL MAINTENANCE		Plumbing Fixture Surface: Repair or Replace @ Sink
	KITCHEN	INTER-WALLS/CEILING		Flooring: Repair/Replace @ Transitions or where needed.
	KITCHEN	PLMG FIXTURE SURFACE		
	LIVING ROOM	FLOOR COVERING		

	LIVING ROOM	INSECT SCREENS	Insect Screens, Replace Defective or missing Secure loose fitting one
WALL ST 104	BEDROOM1	INTER-WALLS/CEILING	Window area.
	ENTRY	INTER-WALLS/CEILING	Peeling paint or door.
	HALL	WINDOW/DOOR MAINT	
	HALL BATH	INTER-WALLS/CEILING	
	KITCHEN	COUNTER/DRAINBOARD	Replace broken tile. Grout or re-attach as needed
	KITCHEN	GENERAL MAINTENANCE	Cabinets: Repair/replace doors,drawers,framing or hardware.
	KITCHEN	INTER-WALLS/CEILING	
	KITCHEN	CAULKING	Caulk/Grout/Tile,Sinks,Fixtures,Countertops,Splashboard as needed.
	KITCHEN	DAMPNESS IN ROOMS	Dampness in room is causing water damage. Correct source of damage
	LIVING ROOM	COVERS-SWITCH/RECEP	
WALL ST 105	BEDROOM1	INTER-WALLS/CEILING	Patch and paint where needed.
	HALL	WINDOW/DOOR MAINT	Replace missing door hardware.
	HALL BATH	INTER-WALLS/CEILING	Repair ceiling and paint.
	HALL BATH	CAULKING	
	HALL BATH	DAMPNESS IN ROOMS	Dampness in room is causing water damage. Correct source of damage
	KITCHEN	GENERAL MAINTENANCE	Cabinets: Repair/replace doors,drawers,framing or hardware.
	KITCHEN	INFESTATION	Roach Infestation Problem:Take measures to abate. Provide receipts.
	LIVING ROOM	INTER-WALLS/CEILING	Patch and paint where needed.
WALL ST 106	HALL	INTER-WALLS/CEILING	Reeling paint on door.
WALL ST 201	BEDROOM1	SMOKE DETECTORS	
	HALL BATH	CAULKING	Bathtub
	KITCHEN	Fixture DEF/LEAK	Broken stem of faucet.
	LIVING ROOM	INSECT SCREENS	Insect Screens, Replace Defective or missing Secure loose fitting one
WALL ST 202	BEDROOM1	INTER-WALLS/CEILING	Peeling paint on door
	HALL BATH	FLOOR COVERING	
	HALL BATH	Fixture DEF/LEAK	Replace broken, cracked toilet.
	KITCHEN	GENERAL MAINTENANCE	Cabinets: Repair/replace doors,drawers,framing or hardware.
	KITCHEN	PLMG FIXTURE SURFACE	Plumbing Fixture Surface: Repair or Replace @ Sink
	LIVING ROOM	FLOOR COVERING	Flooring: Repair/Replace @ Transitions or where needed.
WALL ST 203	HALL	INTER-WALLS/CEILING	Peeling paint on door.
WALL ST 204	Entire Unit	INFESTATION	Roach Infestation: Take measures to abate. Provide receipts.
	HALL	FLOOR COVERING	
	HALL	INTER-WALLS/CEILING	Peeling paint on door.
	HALL BATH	CAULKING	Bathtub and sink
	HALL BATH	Fixture DEF/LEAK	
	HALL BATH	LOOSE FIXTURES	Sink.
	KITCHEN	COUNTER/DRAINBOARD	Repair/ reglaze or replace.
	KITCHEN	PLMG FIXTURE SURFACE	
WALL ST 205	BEDROOM1	SMOKE DETECTORS	
	ENTRY	INTER-WALLS/CEILING	Peeling paint on entry door.
	HALL BATH	INTER-WALLS/CEILING	
	HALL BATH	PLMG FIXTURE SURFACE	Dampness in room is causing water damage. Correct source of damage.
	HALL BATH	DAMPNESS IN ROOMS	
	KITCHEN	COUNTER/DRAINBOARD	Sink.
	KITCHEN	Fixture DEF/LEAK	
	KITCHEN	PLMG FIXTURE SURFACE	
	LIVING ROOM	INSECT SCREENS	Insect Screens, Replace Defective or missing Secure loose fitting one

	WALL ST 206	Entire Unit	INFESTATION	Roach Infestation Problem:Take measures to abate. Provide receipts.
		HALL BATH	INTER-WALLS/CEILING	Sink, bathtub and toilet.
		HALL BATH	CAULKING	Bathtub.
		HALL BATH	PLMG FIXTURE SURFACE	
		KITCHEN	FLOOR COVERING	Cabinets: Repair/replace doors,drawers,framing or hardware.
		KITCHEN	GENERAL MAINTENANCE	Sink
		KITCHEN	CAULKING	Nails protruding over linoleum.
		LIVING ROOM	GENERAL MAINTENANCE	
	WALL ST 207	Entire Unit	UNIT ACCESS	
	WALL ST 301	ENTIRE UNIT	UNIT ACCESS	
		ENTRY	INTER-WALLS/CEILING	Peeling paint on door.
	WALL ST 302	BEDROOM1	INTER-WALLS/CEILING	Patch and paint near window.
		ENTIRE UNIT	INFESTATION	Roach Infestation Problem:Take measures to abate. Provide receipts.
		HALL	ELECTRICAL-GENERAL	Provide cap on missing circuits
		HALL BATH	FLOOR COVERING	
		HALL BATH	FIXTURE DEF/LEAK	Leaking Plumbing Fixture, Repair @ bathtub
		HALL BATH	LOOSE FIXTURES	Toilet.
		HALL BATH	PLMG FIXTURE SURFACE	Repair/reglaze bathtub.
		KITCHEN	COUNTER/DRAINBOARD	
		KITCHEN	FLOOR COVERING	
		KITCHEN	GENERAL MAINTENANCE	Flooring: Repair/Replace @ Transitions or where needed.
		KITCHEN	PLMG FIXTURE SURFACE	Cabinets: Repair/replace doors,drawers,framing or hardware.
	WALL ST 303	BEDROOM1	TENANT SANITATION	Sink
		HALL	ELECTRICAL-GENERAL	Remove excessive storage.
		HALL BATH	VENTILATION-BATHS	Provide cap on missing circuits
		HALL BATH	INTER-WALLS/CEILING	Repair/ replace.
		HALL BATH	CAULKING	Door
		HALL BATH	FIXTURE DEF/LEAK	Bathtub and sink.
		HALL BATH	LOOSE FIXTURES	Toilet.
		KITCHEN	FLOOR COVERING	Toilet.
		KITCHEN	CAULKING	
		LIVING ROOM	FLOOR COVERING	
		LIVING ROOM	INSECT SCREENS	Sink.
	WALL ST 304	BEDROOM1	SMOKE DETECTORS	Flooring: Repair/Replace @ Transitions or where needed.
		BEDROOM1	INTER-WALLS/CEILING	Insect Screens, Replace Defective or missing Secure loose fitting one
		Entire Unit	INFESTATION	
		HALL	ELECTRICAL-GENERAL	Peeling paint on door.
		HALL	FLOOR COVERING	Roach Infestation:Take measures to abate. Provide receipts.
		HALL BATH	VENTILATION-BATHS	Provide cap on missing circuits
		HALL BATH	CAULKING	
		KITCHEN	COUNTER/DRAINBOARD	Repair or replace.
		KITCHEN	CAULKING	Bathtub and sink.
		KITCHEN	PLMG FIXTURE SURFACE	
	WALL ST 305	Entire Unit	UNIT ACCESS	
	WALL ST 306	Entire Unit	INFESTATION	Roach Infestation : Take measures to abate. Provide receipts.
		HALL	INTER-WALLS/CEILING	
		HALL BATH	VENTILATION-BATHS	
		HALL BATH	GENERAL MAINTENANCE	Secure/ replace loose tile above bath.

HALL BATH	INTER-WALLS/CEILING
HALL BATH	CAULKING
HALL BATH	Fixture Def/Leak
KITCHEN	COUNTER/DRAINBOARD
KITCHEN	GENERAL MAINTENANCE
KITCHEN	CAULKING
KITCHEN	PLMG FIXTURE SURFACE
LIVING ROOM	FLOOR COVERING
LIVING ROOM	INTER-WALLS/CEILING
LIVING ROOM	INSECT SCREENS
WALL ST 307	ENTIRE UNIT
	UNIT ACCESS

Bathtub.

Sink

Cabinets: Repair/replace doors,drawers,framing or hardware.

Sink

Flooring: Repair/Replace @ Transitions or where needed.

Replace torn/missing/detective window screens.



**ENVIRONMENTAL HEALTH
HOUSING OFFICIAL INSPECTION REPORT**

COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC HEALTH

INSPECTION DATE(S)

10/6/11

COMPLIANCE DATE(S)

10/31/11 For Report

SITE NUMBER

██████████

SITE ADDRESS:

██████████ 6011 St. Los Angeles CA 90011

PERMIT/LIC. #

PROG/ELEM.

SERVICE CODE

2441

5202

CENSUS TRACT

SUBDISTRICT

SPA

2267.00

09

005

REFERRALS:

B & S Fire Zoning

MAD/VCD Other

OWNER NAME/DBA:

██████████ Los Angeles CA 90016

OWNER MAILING ADDRESS:

No Significant Health Code Violations Observed at Time of Inspection

The checked items represent Health Code violations for the units or areas specified and must be corrected by the compliance date(s) given above, unless otherwise stated in the body of the report. SEE REVERSE SIDE FOR VIOLATION CATEGORY INSTRUCTIONS.

All violations, including violations existing in units not inspected, shall be corrected in a workmanlike manner to conform with all state and local regulations. Obtain any necessary approvals and/or permits before commencing repairs or construction.

Inspector Use Only	CATEGORY	VIOLATION CATEGORIES	AREA/UNITS						COMMENTS/ADDITIONAL INSTRUCTIONS
			1	2	3	4	5	6	
1 ② 3	INSECTS								Unit 101
4 5 6	RODENTS								1) Eliminate mice on wall next to bathroom.
7 8 9	WATER SUPPLY								2) Repair Damaged floor cabinet next to bathroom.
11 12	PLUMBING								3) Replace / Re place Torn carpet in bedroom.
13 14 15	STAIRS								
16 17 18	WALLS								
19 20 21	FLOORS								
22 23 24	CEILINGS								
25 26 27	ELECTRICAL								
28 29 30	POOL/SPA								
31 32 33	TOILETS								
34 35 36	SINKS								
37 38	BATH/SHOWER								
40 41 42	COMFORT HEAT								
43 44	APPLIANCE/FURN								
46 47 48	OCCUPANCY								
49 50	LIGHTING								
52 53	WINDOWS/VENTIL.								
55 56	REFUSE AREA								
58 59	SANITATION								
61	MAINTENANCE								
64 65 66	ROOF								
67	VENT SCREENS								
70 71 72	MISCELLANEOUS								

Not available for inspection - Units: 305, 306, 307, 303, 309, 308, 306, 203, 105

Tenant stated no problems - Units:

No problems found - Units: 102, 106, 104

SITE CONDITION 100% 75% 50% 25%

OFFICE ADDRESS AND PHONE NUMBER
ENVIRONMENTAL HEALTH
District Surveillance and Enforcement Bureau
MURRAY DISTRICT
695 S. Vermont Avenue, 14th Floor
Los Angeles, CA 90005
(213) 351-5085 • Fax: (213) 637-4882

INSPECTED BY: ██████████

E.I.S.

REPORT RECEIVED BY:

U. S. Mail

FILE:

PAGE 1 OF 1



COUNTY OF LOS ANGELES • PUBLIC HEALTH
ENVIRONMENTAL HEALTH
HEALTHY HOMES PROPERTY OWNER
RECOMMENDATION REPORT



Site Address:	Wall St. Los Angeles CA 90011	Site Number:	
Owner Name:		Owner Address:	
Inspected by:	1. [REDACTED]	2. [REDACTED]	3. [REDACTED]

The potentially hazardous conditions marked below were observed on your property. These conditions could cause harm/injury to persons on the property or lead to costly repairs. The following corrections are recommended:

WATER INTRUSION - Can lead to mold growth and costly structural damage.

- 171. Building lacking rain gutter system—can lead to pooling of water on the roof and/or water intrusion into the building.
- 172. Sprinklers hitting building—can cause water damage on interior/exterior walls/ surfaces.
- 173. Drainage issues—improper water drainage can lead to water intrusion into the units.

TRIP/FALL/DROWNING - Unsafe conditions can cause accidents and injuries.

- 174. Poor traction—on common area walkways & stairs can result in slips & falls, especially when wet.
- 175. Inadequate lighting—can result in poor visibility, safety hazards such as trips & falls, and other public safety issues.
- 176. Excessive spacing between baluster—can result in serious injury to a child if gaps are greater than 4 inches.
- 177. Container full of standing water—can become a drowning hazard to children and can allow mosquitoes to breed.
- 178. Child Attractive Nuisance — such as open trenches, wheelbarrow, unattended ladder, and exposed nails can attract a child to the hazards and become injured.

POISONING - Take simple precautions to prevent accidental poisoning on your property.

- 179. Hazardous materials—paint cans/pesticides can cause injury if not properly stored away from children.
- 180. Lead hazards—bare soil around buildings built before 1978 may contain lead that can poison children. Cover bare areas with grass or other ground cover. Do not allow children to play in areas with bare soil.
- 181. No carbon monoxide detectors in units—carbon monoxide can lead to death, even at low levels.

VERMIN/PESTS - Can cause injury or illness and possible fatal allergic reactions from bites, stings, etc.

- 182. Termites—can damage the building's structural integrity and compromise building safety.
- 183. Bees, wasps, spiders, ants or other venomous pests—can cause injury or illness through bites, stings, etc.

SCALD/BURN - Water temperature above 120 ° F can cause scald/burn injuries.

- 184. Water too hot: over 120° F—can lead to scalding or burns, especially to young children and the elderly. Water temperatures at the fixtures should be no more than 120° F to prevent burns. Minimum requirements for hot water are 110° F per State Law.

MISCELLANEOUS

- 185. Other— _____

Questions regarding this notice may be directed to the District Office listed below:

OFFICE ADDRESS AND PHONE NUMBER ENVIRONMENTAL HEALTH
District Surveillance and Enforcement Bureau MUNICIPAL DISTRICT 695 S. Vermont Avenue, 14th Floor Los Angeles, CA 90005 (213) 351-5085 • Fax: (213) 637-4882

Revised 11-1-10

INSPECTOR



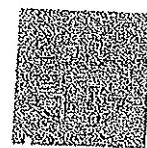
COUNTY OF LOS ANGELES
Public Health

JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

5050 Commerce Drive
Baldwin Park, California 91706
www.publichealth.lacounty.gov



BOARD OF SUPERVISORS

Gloria Molina
First District
Mark Ridley-Thomas
Second District
Zev Yaroslavsky
Third District
Don Knabe
Fourth District
Michael D. Antonovich
Fifth District

Dear Property Owner/Manager:

Each year, all rental property in the County of Los Angeles receives an inspection for the purpose of assessing compliance with applicable State and local health and safety codes. The County Department of Public Health is enhancing these inspections to incorporate the principles of *Healthy Homes* in order to reduce health and safety risks in rental housing.

A *Healthy Home* is characterized as a "home environment that is safe, free of vermin, well ventilated and dry, and where exposure to pesticides, lead paint, and other harmful household chemicals has been minimized. This new type of inspection takes a more preventive approach than a conventional compliance inspection, which identifies specific code violations, by addressing a wide range of housing related risks not covered in current code."

During the recent inspection of your property, specific health code violations were observed and are listed on the attached *Housing Official Inspection Report*. These violations must be corrected by the compliance date specified on the report. A *Healthy Homes* survey was also conducted, the findings and recommendations from which are included in the attached *Healthy Homes Property Owner Recommendation Report*. Although strictly advisory, these recommendations are provided to inform you of actions you could take to minimize the risk of illness or injury to tenants and potentially prevent costly structural damage to your property.

The *Healthy Homes* survey also identified conditions within some of the units related to health and safety risks that are under the control of the tenant. The tenant was provided with information and recommended actions they could take including, proper cleaning and housekeeping, smoking prevention, proper use of electrical cords, and the safe storage of cleaners, pesticides and medicines.

If you should have any questions, please do not hesitate to contact the Environmental Health Inspector listed on the attached reports.

Sincerely,

Angelo J. Bellomo, REHS
Director of Environmental Health



**ENVIRONMENTAL HEALTH
HOUSING OFFICIAL INSPECTION REPORT
CONTINUATION FORM**

INSPECTION DATE:	SITE NUMBER
10-6-11	691809
INSPECTED BY:	